

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

<b>In the Matter of The Empire District</b>	)	
<b>Electric Company d/b/a Liberty, The</b>	)	
<b>Empire District Gas Company, Liberty</b>	)	
<b>Utilities (Missouri Water), LLC d/b/a Liberty</b>	)	
<b>Utilities, and Liberty Utilities (Midstates</b>	)	<b>Case No. AU-2021-0072</b>
<b>Natural Gas) Corp. d/b/a Liberty Utilities</b>	)	
<b>for Accounting Authority Orders Allowing</b>	)	
<b>the Electric, Gas, Water, and Wastewater</b>	)	
<b>Utilities to Record and Preserve Costs</b>	)	
<b>Related to COVID-19</b>	)	

**MISSOURI SCHOOL BOARDS' ASSOCIATION**  
**APPLICATION TO INTERVENE**

Comes Now the Missouri School Boards' Association (hereinafter "MSBA"), by and through counsel, RSBIII, LLC, Richard S. Brownlee, III, and pursuant to 20 CSR 4240-2.075, files its Application to Intervene in the above referenced matter. In support of its Application, the MSBA states the following:

1. MSBA is a 501(c)(6) not-for-profit corporation representing 390 school districts in the State of Missouri as a trade association, many of which are subject to Empire District's and Liberty Utilities' electric and natural gas tariff rates.
2. Missouri Section 393.310 RSMo., clearly recognizes the direct involvement of schools in matters before the Commission dealing with gas corporations as relating to public school tariff filings, gas purchasing, gas resale, gas metering, and gas aggregation.
3. On September 17, 2020, The Empire District Electric Company, The Empire District Gas Company, Liberty Utilities (Missouri Water), LLC, and Liberty Utilities (Midstates Natural Gas) Corp. (collectively "Liberty") applied for accounting authority orders permitting

them to track and defer in regulatory assets all incremental costs and other financial impacts specifically including lost revenues related to the COVID-19 pandemic.

4. MSBA opposes the issuance of an Accounting Authority Order to the extent it would allow retroactive recovery of lost revenues related to COVID-19. Missouri schools are struggling with extraordinary costs due to the COVID-19 pandemic and cannot support paying for utility services that they were not provided.

5. MSBA's interests in this filing are unique and cannot be reasonably represented by any other entity.

6. MSBA has been granted intervenor status in previous filings by the Public Service Commission in other gas utility cases and actively participated in those proceedings.

**WHEREFORE**, the Missouri School Boards' Association requests that it be granted intervention on the above referenced matter.

Respectfully submitted,  
RSBIII, LLC

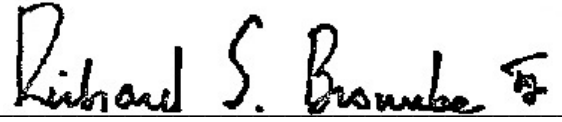
A handwritten signature in black ink that reads "Richard S. Brownlee III" with a stylized flourish at the end.

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 30<sup>th</sup> day of September, 2020.

A handwritten signature in black ink that reads "Richard S. Brownlee III". The signature is written in a cursive style and is positioned above a horizontal line.

Richard S. Brownlee III, Attorney