BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of The Empire District Gas)	
Company's Request to File Tariffs to)	Case No. GR-2021-0320
Change its Rates for Natural Gas Service)	

APPLICATION TO INTERVENE OF THE MIDWEST ENERGY CONSUMERS GROUP

COMES NOW the Midwest Energy Consumers Group ("Applicant" or "MECG"), pursuant to 20 CSR 4240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, and for its Application to Intervene respectfully states as follows:

- 1. The Midwest Energy Consumers Group is an incorporated association representing the interests of large commercial and industrial users of electricity, gas and water services.
- 2. The matters to be considered in this case and the Commission's determinations thereon, could have a direct and significant impact on Applicant's cost of energy service and the manner in which it is supplied. Therefore, granting this proposed intervention to the Applicant will serve the public interest and will assist the Commission in development of a more complete record.
- 3. As a representative of large user customers of Empire District Gas Company, the Applicant has a direct and immediate interest in these proceedings that is different from that of the general public. While Applicant does not at this time have sufficient information to assert a position on this investigation, it reserves the right to assert positions after it has had an adequate opportunity to examine the record, and any documentation of other parties filed herein.

4. Correspondence and communications regarding this application, including

service of all notices and orders of this Commission, should be addressed to:

David L. Woodsmall

Woodsmall Law Office 308 East High Street, Suite 204

Jefferson City, MO 65101

WHEREFORE, having stated the grounds for intervention and the position and

interest of the Applicant in these proceedings, Applicant asks that the Commission grant

this Application for Intervention, and thereby entitle said Applicant to have notice of and

to appear at the taking of testimony, to produce and cross-examine witnesses, and to be

heard through counsel on the argument, and in all other respects to be made parties to this

proceeding.

Respectfully submitted,

__/s/ David Woodsmall_

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ATTORNEY FOR THE **MIDWEST**

ENERGY CONSUMERS GROUP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email,

facsimile or First Class United States Mail to all parties by their attorneys of record as

provided by the Secretary of the Commission.

David L. Woodsmall

Dated: August 24, 2021

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