

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

In the Matter of the Propriety of the Rate)
Schedules for Electric Service of the Empire) File No. ER-2018-0228
District Electric Company)

APPLICATION TO INTERVENE OF CITY OF JOPLIN, MISSOURI

COMES NOW the City of Joplin, by and through counsel, pursuant to 4 CSR 240-2.075, and applies to intervene and become a party in the above-referenced case and in support of its Application to Intervene states as follows:

1. The City of Joplin (Joplin) is a municipality located in Jasper County, Missouri. The Empire District Electric Company (Empire) operates within the City of Joplin under a franchise granted by the City, and various parts of its plant occupy City right-of-way. The City has a police power interest in Empire’s exercise of its franchise that is different from the interest of the general public. In addition, the City also has an interest in the welfare of its citizens, who receive their electric service from Empire, that is different from the interest of the general public.

2. The Missouri Public Service Commission has previously recognized Joplin’s interest in proceedings affecting the rates for electric service in the Empire Joplin District in permitting Joplin’s intervention in prior Empire rate-related proceedings, including File Nos. ER-2018-0092, ER-2017-0254, ER-2014-0351, ER-2010-0130 and ER-2011-0004.

3. On February 16, 2018, the Staff of the Public Service Commission filed a Motion to Open Rate Case and Require Company to Show Cause.

4. On February 21, 2018, the Missouri Public Service Commission issued an Order opening rate case, directing notice and establishing an intervention filing date, and requiring

company to show cause why its rates should not be adjusted.

5. On information and belief, the Notice sent was mailed to the City of Joplin and not emailed to counsel of record in Empire's last rate case or Empire's pending case regarding wind projects. Joplin's intervention will not delay or impede the adjudication of this case.

6. Joplin states, pursuant to 4 CSR 240-2.075(2), that it opposes the Company's position in that Joplin believes the Commission should order the Company to promptly file tariffs, reducing its rates for every class and the Commission should order the company to promptly file tariffs reducing its rates for every class and category of electric service to reflect the percentage reduction in its federal-state effective income tax rate.

7. As required by 4 CSR 240-2.075(10), the City of Joplin accepts the record established in this case, including the requirements of all orders of the Commission, as of the date of this filing.

8. No party will be prejudiced by the City of Joplin's intervention in this case.

9. Correspondence, communications, orders and decisions in this matter should be addressed to:

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WHEREFORE, for the foregoing reasons, the Intervenor City of Joplin respectfully requests that the Commission grant this Application to Intervene in this matter.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading has been served by electronic means on all parties of record as reflected in the records maintained by the Secretary of the Commission through the EFIS system.

/s/ Marc H. Ellinger
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