

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

In the Matter of the Application of )  
The Empire District Electric Company for ) Case No. EO-2018-0092  
Approval of Its Customer Savings Plan. )

**APPLICATION TO INTERVENE  
OF RENEW MISSOURI**

COMES NOW, Renew Missouri Advocates (“Renew Missouri”), pursuant to Missouri Public Service Commission rule 4 CSR 240-2.075, and applies to intervene in the above-styled case. In support of its Application, Renew Missouri states:

1. Renew Missouri is a non-profit corporation organized under the laws of Missouri with its principal place of business within Missouri. Renew Missouri Advocates is a registered name under § 417.200 RSMo., with its principal place of business at 409 Vandiver West, Building 5, Suite 205, Columbia, MO 65202. Renew Missouri is a clean energy policy and advocacy group whose mission is to transform Missouri into a leading state in renewable energy and energy efficiency.

2. Pleadings, notices and other correspondence in this case should be directed to:

Andrew J. Linhares  
Renew Missouri Advocates  
409 Vandiver Dr, Building 5, Suite 205  
Columbia, MO 65205  
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3. On October 31, 2017, Empire District Electric Company (“Emipre”) filed its Application for approval of its “Consumer Savings Plan” (“the Plan”), along with an Application for certain waivers and variances. The Plan seeks to develop 800 MW of wind capacity in or near

Empire’s service territory and to retire its Asbury coal plant, and in so doing achieve \$325 million in customer savings over the next 20 years.

4. Renew Missouri has an interest in Empire’s planned wind investments, coal retirements, and approaches to tax equity included in its Plan. As statewide advocates for energy efficiency and renewable energy policy, Renew Missouri has interests that are distinct from those of the general public, and thus Renew Missouri and its mission may be adversely affected by a final order arising from this case.

5. Granting Renew Missouri intervention will serve the public interest by assisting the Commission’s record for decisions in this case, and no party will be adversely affected by such intervention.

WHEREFORE, Renew Missouri submits this Application to Intervene and respectfully requests that it be permitted to intervene, granted access to all work papers and highly confidential information, and be made a party to this case for all purposes.

Respectfully Submitted,

*/s/ Andrew J. Linhares*  
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ATTORNEY FOR  
RENEW MISSOURI ADVOCATES

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was mailed, faxed, or emailed to all counsel of record on this 131st day of October 2017.

*/s/ Andrew J. Linhares*  
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Andrew J. Linhares