

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

In the Matter of The Empire District Electric Company's)
Submission of Its RES Compliance Report and Plan) File No. EO-2017-0267

**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 1200 Rogers St, Suite B, Columbia, MO 65201. Renew Missouri is a not-for-profit clean energy policy and advocacy group whose mission is to transform Missouri into a leading state in renewable energy and energy efficiency by 2020.

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

David G. Cohen
1200 Rogers St, Suite B
Columbia, MO 65201
(785) 845-3593 (T)
(314) 558-8450 (F)
David@renewmo.org

3. On April 12, 2017, The Empire District Electric Company ("Empire") submitted its 2016 RES Compliance Report and 2017-2019 RES Compliance Plan in compliance with 4 CSR 240-20.100(8). On April 12, 2017, the Commission issued an Order directing Staff to file a report and setting a deadline for the Office of Public Counsel and any other interested entity to file comments. Because outside parties have not received confidential work papers or access to

highly confidential or proprietary information in this case, Renew Missouri is submitting this Application to Intervene before filing comments.

4. Renew Missouri was involved in the passage of Proposition C in November 2008, which gave rise to Missouri's Renewable Energy Standard ("RES") (§393.1025-1030, RSMo). Since then, Renew Missouri has been involved in various stages of rulemaking, utility compliance, and formal complaints concerning the RES before the Commission. As advocates for the furtherance of renewable energy investment and best-practices renewable energy policy in Missouri, Renew Missouri's interests are different from those of the general public and 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 other purposes.

Respectfully Submitted,

/s/ David G. Cohen

David G. Cohen, #69663

1200 Rogers St., Suite B

Columbia, MO 65201

T: (785) 845-3593

F: (314) 558-8450

David@renewmo.org

ATTORNEY FOR RENEW MISSOURI

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 18th day of April 2017.

/s/ David G. Cohen

David G. Cohen