

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

In the Matter of The Empire District Electric)
Company for Authority to File Tariffs Increasing)
Rates for Electric Service Provided to Customers) Case No. ER-2014-0351
in the Company’s Missouri Service Area)

MOTION TO ADD NEW MEMBERS

COMES NOW the Midwest Energy Consumers Group (“Applicants” or “MECG”), pursuant to 4 CSR 240-2.075(7) of the Missouri Public Service Commission’s Rules of Practice and Procedure, and for its Motion to Add New Members respectfully states as follows:

1. The Midwest Energy Consumers Group (“MECG”) is an unincorporated association of large users of electricity. On September 18, 2014, MECG intervened in this case on behalf of General Mills, Walmart, Sam’s Club East, and Praxair. On September 24, 2014, the Commission granted MECG’s Application to Intervene.

2. Since the time that it filed its Application to Intervene, MECG has been contacted by five other large industrial users of Empire asking to participate in MECG. Specifically, Jasper Products, LLC.; Tyson Foods, Inc.; Tamko Building Products, Inc.; George’s Processing, Inc. and Simmons Feed Ingredients, Inc. all now seek to participate in MECG’s efforts in this case.

3. MECG asserts that adding these additional members will not prejudice the parties in this case. Importantly, this motion will not cause the creation of an additional party. MECG is a party to this case and will continue to be a party. Rather, this motion merely seeks to include additional participants within MECG. Like the previous

members of MECG, the five new members are all listed among Empire's 20 largest customers. As such, these members are similarly situated and will not cause the introduction of new issues into this case. Specifically, as before, MECG still plans to focus primarily on class cost of service, revenue allocation and rate design issues. Pursuant to 4 CSR 240-2.075(10), MECG and its new members accepts the record established in this case, including the requirements of any orders previously issued by the Commission in this docket.

4. MECG asserts that there is a good cause to grant this motion. Entities unfamiliar with the Public Service Commission and its process typically take a great deal of time to conduct due diligence regarding the decision to devote financial resources to an intervention group. This includes reference checks on the attorney as well as reviewing previous work product of that attorney. Many times this due diligence cannot be completed by the Commission's intervention deadline. That said, this process was completed within the early stages of this case, prior to any testimony being filed. As such, while after the intervention deadline, the inclusion of these additional members will not prejudice the other parties or the Commission's administration of this docket. Further, by financially supporting MECG's efforts to file class cost of service, revenue allocation and rate design testimony, the addition of these members will provide the Commission a more complete record upon which to make its decisions.

WHEREFORE, MECG respectfully requests that the Commission grant its Motion to add the following entities as members of its intervention group: Jasper Products, LLC.; Tyson Foods, Inc.; Tamko Building Products, Inc.; George's Processing, Inc. and Simmons Feed Ingredients, Inc.

Respectfully submitted,



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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: October 27, 2014