

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

In the Matter of the Empire District Electric)
Company, Liberty Utilities (Central) Co. and) File No. EM-2016-0213
Liberty Sub Corp. Concerning an Agreement and)
Plan of Merger and Certain Related Transactions)

**APPLICATION TO INTERVENE
OF RENEW MISSOURI**

COMES NOW, Earth Island Institute d/b/a Renew Missouri (“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. Earth Island Institute is a non-profit corporation organized under the laws of
California with its principal place of business at 2150 Allston Way, Suite 460, Berkeley, CA
94704. Earth Island has a Certificate of Authority for a Foreign Nonprofit granted by the
Missouri Secretary of State. Renew Missouri is a registered fictitious name of Earth Island
Institute under § 417.200 RSMo., with its principal place of business at 910 E. Broadway, Suite
205, 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 2016.

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

Andrew J. Linhares
Staff Attorney, Renew Missouri
910 E. Broadway, Ste. 205
Columbia, MO 65201
(314) 471-9973
(314) 558-8450
Andrew@renewmo.org

3. On March 16, 2016, The Empire District Electric Company (“Empire”) and Liberty Utilities (Central) Co. (“LU Central”) and Liberty Sub Corp. filed a joint application asking the Commission to approve a transaction in which LU Central would acquire all of the common stock of Empire.

4. On March 16, 2016, the Commission issued its *Order Directing Notice and Setting Intervention Date*, which set an intervention deadline of April 14, 2016.

5. As a nonprofit organization focused on renewable energy and energy efficiency, Renew Missouri works closely with Missouri utilities, like Empire, to ensure compliance with Missouri laws and regulations. As advocates for the furtherance of renewable energy investment and best-practices renewable energy policy in Missouri, Renew Missouri’s interests are different than those of the general public and may be adversely affected by a final order arising from this case.

4. 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 and be made a party to this case for all purposes.

Respectfully Submitted,

/s/ Andrew J. Linhares

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ATTORNEY FOR EARTH ISLAND
INSTITUTE d/b/a 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 14th day of April 2016.

/s/ Andrew J. Linhares _____

Andrew J. Linhares