

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

In the Matter of the Application of Union                    )  
Electric Company d/b/a Ameren Missouri                    )       File No. ET-2018-0132  
for Approval of Efficient Electrification Program        )

**APPLICATION TO INTERVENE OF  
THE EMPIRE DISTRICT ELECTRIC COMPANY**

COMES NOW The Empire District Electric Company (“Empire”), by and through counsel, and for its application pursuant to Missouri Public Service Commission (“Commission”) Rules 4 CSR 240-2.060 and 2.075 to intervene and fully participate in the captioned case, states as follows:

1. Empire is a Kansas corporation with its principal office and place of business at 602 South Joplin Avenue, Joplin, Missouri, 64801. Empire is engaged in the business generally of providing electrical and other utility services in Missouri to customers in its service areas. Empire is an “electrical corporation,” as that term is defined in RSMo. §386.020, and is subject to the jurisdiction and supervision of the Commission as provided by law.

2. All communications, notices, orders, and decisions respecting this application and proceeding should be addressed to the undersigned counsel.

3. Ameren Missouri initiated this case to seek approval of two new tariffed programs (collectively referred to as the “Charge Ahead” program), approval of modifications to its existing distribution system extension procedures, and for accounting authority to defer costs associated with the Charge Ahead program. Ameren Missouri filed tariff sheets reflecting the terms of the Charge Ahead program, which consists of an Electric Vehicle Charging Infrastructure Incentive Program (“Charge Ahead – Electric Vehicles”) and an Efficient Electrification Program (“Charge Ahead – Business Solutions”).

4. By order issued February 23, 2018, the Commission established an intervention deadline of March 14, 2018. At that time, Ameren Missouri's Charge Ahead tariffs were to take effect by operation of law on April 23, 2018, and Empire did not believe intervention in the case was necessary.

5. Subsequent to the intervention deadline, the Staff of the Commission ("Staff") recommended that the tariff sheets related to Ameren Missouri's line extension policy be rejected as single-issue ratemaking, and Staff recommended that the other tariff sheets be suspended "for 120 days for determination after hearing that the waiver of the applicable promotional practices prohibitions is reasonable, that the calculations supporting Ameren Missouri's programs are not based on inconsistent assumptions, and that the design of discreet subprograms and the budgets for those subprograms are adequate." Also, the Office of the Public Counsel ("OPC") filed a motion to dismiss Ameren Missouri's application for lack of jurisdiction. By order issued April 12, 2018, the Commission suspended Ameren Missouri's Charge Ahead tariffs for 120 days from the requested effective date. Due to these developments, Empire believes intervention in the case is now necessary.

6. Empire has an interest in this case that is different from that of the general public and that could be adversely affected by a final order arising from the case, and Empire's intervention in this case will serve the public interest.

7. Empire does not yet have a position on the issues presented in this case. Empire's interest in the case relates to the Commission's and the parties' treatment of Ameren Missouri's application, and the Commission's decisions regarding the legal arguments raised by Staff and OPC. Like Ameren Missouri, Empire is interested in promoting more beneficial and efficient uses

of electricity, and Empire must determine the proper course to take with regard to its own electric vehicle charging infrastructure and related rate matters.

8. It is not Empire's intention to cause any change to the procedures now in place in this case. Empire accepts the record as it stands and all Commission requirements as ordered to date. No party should be prejudiced by Empire's intervention at this time.

WHEREFORE, for good cause shown, Empire respectfully requests that it be permitted to intervene and to be made a party to this case. Empire requests such additional relief as is prudent under the circumstances.

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

/s/ Diana C. Carter

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**CERTIFICATE OF SERVICE**

I hereby certify that the above and foregoing document was filed in EFIS on this 24<sup>th</sup> day of April, 2018, with notice of the same being sent to all counsel of record.

/s/ Diana C. Carter