DEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of The)	
Empire District Electric Company for a)	File No. EA-2019-0010
Certificate of Convenience and Necessity)	
Related to its Customer Savings Plan)	

MISSOURI DIVISION OF ENERGY APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Economic Development – Division of Energy ("DE") and, pursuant to Missouri Public Service Commission ("Commission") Rule 4 CSR 240-2.075, respectfully requests that the Commission grant intervention to DE in the above-styled matter. For its Motion to Intervene, DE states as follows:

1. On October 18, 2018, The Empire District Electric Company ("Empire") filed an application with the Commission seeking an order granting a Certificate of Convenience and Necessity ("CCN") pursuant to section 393.170, RSMo 2016. The CCN would authorize Empire to acquire an interest in two holding companies that own the companies that will be constructing and installing two wind projects – Kings Point and North Fork Ridge – each comprising approximately 150 megawatts of wind generation, as well as authorize Empire to own, operate, maintain, and otherwise control and manage the two wind projects. These projects would be constructed in Barton, Dade, Jasper, and Lawrence Counties in Missouri and are the result of a related proceeding before the Commission in File No. EO-2018-0092. DE is a party in File No. EO-2018-0092.

- 2. On October 24, 2018, the Commission issued an *Order Directing Notice, Setting Intervention Deadline, and Setting Time for Responses* which established an intervention deadline of no later than November 6, 2018.
- 3. DE is a state agency vested with the powers and duties set forth in § 620.035 RSMo. DE's interests are different than those of the general public, as illustrated by its statutory authority to: (1) plan for future energy needs and energy resource development; (2) monitor and analyze all federal, state, local and voluntarily disclosed private sector energy research projects and voluntarily disclosed private sector energy related data and information concerning supply and consumption; (3) develop, promote, administer and monitor energy conservation programs; (4) consult and cooperate with all state and federal governmental agencies, departments, boards and commissions and all other interested agencies and institutions, governmental and nongovernmental, public and private, on matters of energy research and development, management, conservation and distribution; and (5) analyze the potential for increased use of diverse energy sources, energy efficient technologies, and other energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.
 - 4. DE expects to develop its positions on specific issues as this case proceeds.
- 5. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned.

WHEREFORE, the Division of Energy respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

Is/ Michael Lanahan

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Attorney for Missouri Department of

Economic Development – Division of Energy

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 29th day of October, 2018.

/s/ Michael Lanahan
Michael Lanahan