

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

In the Matter of The Empire                            )  
District Electric Company's Request            )     **File No. ER-2016-0023**  
For Authority to Implement a General        )  
Rate Increase for Electric Service            )

**MISSOURI DIVISION OF ENERGY'S  
MOTION TO INTERVENE**

COMES NOW the Missouri Department of Economic Development –  
Division of Energy<sup>1</sup> (“DE”) and, pursuant to Commission Rule 4 CSR 240-2.075,  
respectfully requests that the Missouri Public Service Commission (“Commission”) grant  
intervention to DE in the above-styled matter. For its Motion to Intervene, DE states as  
follows:

1. On October 16, 2015, The Empire District Electric Company (“Empire”) filed with the Commission a revised tariff to implement a rate increase.
2. On October 19, 2015, the Commission issued its *Order Suspending Tariff, Scheduling Pre-Hearing Conference, Directing Notice, and Setting Deadline for Intervenors*, which set an intervention deadline of November 4, 2015.
3. DE is a state agency vested with the powers and duties set forth in, *inter alia*, §§ 640.150 and 640.676 RSMo.
4. DE’s interests are different than those of the general public, as illustrated by its statutory authority to plan for future energy needs and energy resource

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<sup>1</sup> On August 28, 2013, Executive Order 13-03 transferred “all authority, powers, duties, functions, records, personnel, property, contracts, budgets, matters pending, and other pertinent vestiges of the Division of Energy from the Missouri Department of Natural Resources to the Missouri Department of Economic Development . . . ”

development; develop, promote, administer and monitor energy conservation programs;<sup>2</sup> consult and cooperate with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; and analyze the potential for increased use of energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.<sup>3</sup> DE's intervention, moreover, will serve a public interest, as DE will evaluate the filings from a formal state policy and planning perspective consistent with its interests in clean, affordable, abundant energy, and its efficient use.

5. DE expects to develop its positions on specific issues as this case proceeds.

6. Communications, correspondence, orders, and decision in this matter should be addressed to the undersigned with a copy to [DEDEnergyCases@ded.mo.gov](mailto:DEDEnergyCases@ded.mo.gov)

WHEREFORE, the Missouri Department of Economic Development – Division of Energy respectfully requests that it be allowed to intervene in this case.

Respectfully submitted,

/s/ Alexander Antal

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<sup>2</sup> §§ 640.676 and 640.150.2 RSMo.

<sup>3</sup> § 640.150.1 RSMo.

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 26th day of October, 2015.

/s/ Alexander Antal  
Alexander Antal