

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of Ameren Missouri's	)	
2018 Utility Resource Filing Pursuant to	)	Case No. EO-2018-0038
4 CSR 240 – Chapter 22	)	

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

Comes now The Empire District Electric Company (“Empire” or the “Company”), 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 § 386.020 RSMo 2000, 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 and:

Christopher D. Krygier  
Director, Rates and Regulatory Affairs  
Liberty Utilities  
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3. On or about October 31<sup>st</sup>, Empire filed its application for approval of a proposed Customer Savings Plan to take advantage of a limited window of opportunity to develop up to

800 MW of strategically located wind generation in or near Empire's service territory using federal tax incentives in conjunction with a tax equity partner and retiring its Asbury coal plant that will otherwise require significant capital investment by April 2019. That application has been docketed by the Commission as File No. EO-2018-0092 and has significant implications for resource planning by Empire. Empire's interest in this case is how the Commission, its staff and other parties address, generally, another Missouri electric utility's portfolio of existing and planned energy supply resources, including wind-generated electric power.

4. For the reasons aforesaid, Empire has an interest that is different from that of the general public that may be impacted by the matters addressed in Ameren Missouri's filing.

5. Empire does not yet have a position on the issues presented in this case and reserves the right to make its views known as the case proceeds.

6. For the reasons aforesaid, Empire's intervention in this case will serve the public interest by assisting the Commission to understand the issues presented.

7. The Commission established an intervention deadline of October 16<sup>th</sup> in this case. As noted above, Empire, during the interim, has developed and filed for the Commission's consideration a proposed Customer Savings Plan associated with changing its mix of wind generated energy versus coal-fired power going forward. Now that that proposal has been filed with the Commission, the Company's interest in how such matters may be addressed in the context of integrated resource planning filings is sufficiently well-developed to permit it to engage meaningfully in the matters at hand.

8. It is not Empire's intention to cause any change to the procedures now in place in this case, accepts the record as it stands and all Commission requirements as ordered to date.

9. No party should be prejudiced by Empire's intervention.

WHEREFORE, for good cause shown, Empire requests that it be permitted to intervene and to be made a party to this case.

Respectfully submitted,

Paul A. Boudreau

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ATTORNEYS FOR THE EMPIRE DISTRICT  
ELECTRIC COMPANY

## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail on November 27<sup>th</sup>, 2017, to the following:

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