

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of The Empire District Electric Company's)
Application Concerning Demand-Side Programs) **File No. EO-2012-0206**
and a Demand-Side Program Investment Mechanism)

MOTION TO INTERVENE OF RENEW MISSOURI

Comes now Earth Island Institute d/b/a Renew Missouri, and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, Renew Missouri states the following.

1. Renew Missouri was a participant in the MEEIA rulemaking.
2. **Earth Island Institute** is a non-profit corporation organized under the laws of California with approximately 120 members in Missouri. Its principal place of business is 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. Earth Island provides fiscal sponsorship and other support to environmental projects working toward ecological sustainability. Supporting alternative energy resources—efficiency and renewable energy—is part of this mission. **Renew Missouri** is a registered fictitious name of Earth Island Institute under § 417.200, RSMo, by which Earth Island supports energy programs in Missouri. Renew Missouri supports aggressive implementation of cost-effective utility DSM programs and renewable energy generation and procurement. Its office is located at 910 E. Broadway, Suite 205, Columbia, MO 65201; pj@renewmo.org.

3. Movant's interests focus on environmental protection and hence are

different from those of the general public and could be adversely affected by an order approving inadequate levels of DSM programs or an unreasonable demand-side investment mechanism.

4. Movant is not yet certain of the position it will take in this case.

5. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, Renew Missouri respectfully requests that the Public Service Commission grant its application to intervene.

/s/ Andrew J. Linhares
Andrew J. Linhares (Mo. Bar No. 63973)
Deputy Director, Renew Missouri
910 East Broadway, Ste. 205
Columbia, MO 65201
(314) 471-9973
Andrew@renewmo.org

Attorney for Movant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 13th day of January, 2012, to all counsel of record:

/s/ Andrew J. Linhares
Andrew J. Linhares