

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

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

**MISSOURI DEPARTMENT OF NATURAL RESOURCES'
APPLICATION TO INTERVENE**

COMES NOW Missouri Department of Natural Resources (MDNR)
and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully requests
that the Commission issue its order granting MDNR's Application to
Intervene. For its Application, MDNR states as follows:

1. On February 28, 2012, the Empire District Electric Company
("Empire") filed an application to approve its Demand-Side Programs
Investment Mechanism (DSIM) filing and request for variances with the
Missouri Public Service Commission (PSC). The PSC opened Case No. EO-
2012-0206 to consider Empire's application and on February 29, 2012, issued
an order directing notice, establishing a deadline for intervention requests
and setting a procedural conference. The Order sets a March 9, 2012
deadline for interested parties to intervene, and a March 12, 2012 pre-
hearing conference.

2. MDNR, and specifically its Division of Energy, is a state agency
vested with the powers and duties set forth in Section 640.150, RSMo.

3. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that the Division of Energy will be looking at the proposed filing from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. The Division of Energy's review also will be in relation to the requirements set forth in rules 4 CSR 240-3.163, which lists the information that an electric utility must provide when it seeks to establish a DSIM and to seek approval, modification or discontinuance of demand-side programs. MDNR has a strong interest in encouraging energy efficiency through cost-effective demand-side programs and this interest can be significantly furthered through DSIM filings made under these rules.

4. MDNR has not determined the specific position it will take in this case; however, the Division of Energy has an interest in participating in this matter.

5. Communications, correspondence, orders and decision in this matter should be addressed to:

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with a copy to:

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WHEREFORE, the Missouri Department of Natural Resources
respectfully requests that the Commission grant this Application to Intervene

Respectfully submitted,

CHRIS KOSTER
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served
electronically on all counsel of record this 9th day of March, 2012.

/s/ Jennifer S. Frazier
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