

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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| In the Matter of the Empire District Electric |) | |
| Company's 2019 Triennial Compliance Filing |) | File No. EO-2019-0049 |
| Pursuant to 4 CSR 240-22 |) | |

MOTION TO INTERVENE OF NRDC

Comes now the Natural Resources Defense Council ("NRDC"), and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, NRDC states the following.

1. NRDC is a nonprofit corporation organized under the laws of New York with a Midwest office at 20 North Wacker Drive, Suite 1600, Chicago, IL 60606; contact Ashok Gupta at that address or at 212-243-4351. It has over 4,800 members in Missouri. NRDC and its members are interested in promoting energy efficiency, peak demand reduction and renewable energy resources to meet Missouri's energy needs. NRDC has been active in PSC dockets concerning the Missouri Energy Efficiency Investment Act (MEEIA), electric utility rate cases and IRPs, rulemakings, and working dockets on renewable energy, efficiency, electric vehicles and regulatory policy.

2. NRDC's interests in promoting energy efficiency and renewable energy are different from those of the general public in their environmental emphasis. NRDC seeks to transition from fossil-fueled electricity to energy efficiency and renewable energy in order to reduce pollution and ameliorate the adverse effects of fossil energy on the climate. NRDC is interested in the feasibility and cost-effectiveness of Liberty-Empire's plan to retire coal and gas units and proceed with a MEEIA program for the first time and

substitute solar energy and energy storage for fossil resources going forward.

3. Correspondence, communications, orders and decisions may be sent to:

Henry B. Robertson (Mo. Bar No. 29502)
Great Rivers Environmental Law Center
319 N. Fourth Street, Suite 800
St. Louis, Missouri 63102
(314) 231-4181
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4. NRDC 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, NRDC respectfully requests the Public Service Commission to grant the application to intervene.

/s/ Henry B. Robertson
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Attorney for NRDC

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 23rd day of July, 2019, to all counsel of record.

/s/ Henry B. Robertson
Henry B. Robertson