

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

In the Matter of the Application of The Empire        )  
District Electric Company d/b/a Liberty to            )  
Implement Robust and Mutually-Beneficial Energy )       **File No. EO-2022-0078**  
Efficiency Offerings Under the Framework            )  
Prescribed by MEEIA                                        )

**MISSOURI DIVISION OF ENERGY**  
**APPLICATION TO INTERVENE**

COMES NOW the Missouri Division of Energy (“DE”) and, pursuant to Missouri Public Service Commission (“Commission”) Rule 20 CSR 4240-2.075, respectfully requests that the Commission grant intervention to DE in the above-styled matter. For its *Application to Intervene*, DE states as follows:

1. On September 15, 2021, The Empire District Company d/b/a/ Liberty filed tariff sheets and an application seeking the Commission’s approval to establish a Demand-Side Investment Mechanism.

2. DE is a state agency vested with the powers and duties set forth in § 620.035, RSMo. DE’s interests are different than those of the general public, as illustrated by its statutory authority to: (1) plan for future energy needs and energy resource development; (2) monitor and analyze all federal, state, local and voluntarily disclosed private sector energy research projects and voluntarily disclosed private sector energy related data and information concerning supply and consumption; (3) develop, promote, administer and monitor energy conservation programs; (4) consult and cooperate with all state and federal governmental agencies, departments, boards and commissions and all other interested agencies and institutions, governmental and nongovernmental, public and private, on matters of energy research and development,

management, conservation and distribution; and (5) analyze the potential for increased use of diverse energy sources, energy efficient technologies, and other energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.

3. DE may develop positions on specific issues as this case proceeds.

4. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned.

WHEREFORE, the Missouri Division of Energy respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

/s/ Ryan P. Conway

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**Attorney for Missouri Department of Natural  
Resources' Division of Energy**

### **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been emailed to the certified service list this 8<sup>th</sup> day of October, 2021.

/s/ Ryan P. Conway