

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

In the Matter of the 2022 RES Compliance Report and        )  
2022 RES Compliance Plan of The Empire District        )        **File No. EO-2023-0358**  
Electric Company d/b/a Liberty                                )

**DIVISION OF ENERGY APPLICATION TO INTERVENE**

COMES NOW the Missouri Department of Natural Resources – Division of Energy (DE) and, pursuant to Commission Rule 20 CSR 4240-2.075, respectfully requests that the Commission issue its order granting DE’s Application to Intervene. For its Application, DE states as follows:

1. On April 14, 2023, The Empire District Electric Company d/b/a Liberty (Liberty) filed its 2022 Renewable Energy Standard (RES) Compliance Report and its 2023-2025 RES Compliance Plan as required by Commission Rule 20 CSR 4240-20.100(8).

2. DE is a division of the state agency the Department of Natural Resources, 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. In addition, § 393.1030.4, RSMo tasks DE with certifying renewable energy resources for purposes of compliance with Missouri’s Renewable Energy Standard.

3. DE’s interest in this matter is due to its statutory role pursuant to § 393.1030.4, RSMo in certifying renewable energy resources. The Compliance Report filed in this case will assist DE with its review of certified renewable energy resources, consistent with 10 CSR 140-8.010(4)(B). This statutory interest is different from that of the general public.

4. DE takes no position on the issues presented, and seeks intervention to serve the above interests.

5. Communications, correspondence, orders and decisions in this matter should be addressed to the undersigned.

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

Respectfully submitted,

/s/ Jacob Westen  
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**Attorney for the 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 1<sup>st</sup> day of May, 2023.

/s/ Jacob Westen