

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

In the Matter of the Empire District Electric Company,)
Liberty Utilities (Central) Co. and Liberty Sub Corp.) Case No. EM-2016-0213
Concerning an Agreement and Plan of Merger and)
Certain Related Transactions.)

APPLICATION TO INTERVENE
OF THE LABORERS' INTERNATIONAL UNION OF NORTH AMERICA

COMES NOW the Laborers' International Union of North America ("LiUNA"), and its affiliated District Councils and Local Unions in Missouri, by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in above-captioned merger case, which was jointly initiated on March 16, 2016, by Empire District Electric Company ("Empire"), Liberty Utilities (Central) Co. ("LU Central") and Liberty Sub Corp. (jointly, the "Applicants").

In support of this application, LiUNA states as follows:

1. LiUNA is one of the most progressive and strongest unions in the country, headquartered at 905 16th Street, Northwest Washington 20006, with Regional Headquarters at 1 N. Old State Capitol Plaza, Suite 525, Springfield, Illinois 62701. Over 500,000 strong, LiUNA is the eighth largest labor organization in America, representing a skilled and diverse workforce. Laborers are construction workers, government workers, health care providers, industrial employees, service workers, and educators. Members of LiUNA reside and work throughout Missouri, including within the Missouri service territory and regions impacted by this merger case. The interest of LiUNA and its members in this matter is unique and different than the general public interest.

2. The Applicants are asking this Commission to approve a transaction in which LU Central would acquire all of the common stock of Empire, along with other requests. LiUNA has a significant interest in the subject matter of this merger proceeding, and its members will be affected by any order entered by the Commission in this case. LiUNA reserves the right to state its opinions in more detail regarding whether the relief requested in this pending merger case would serve the public interest, pending its further investigation and review of the matter.

3. Correspondence, communications, orders and the decision in this matter should be addressed to: John B. Coffman, John B. Coffman LLC, 871 Tuxedo Blvd., St. Louis, MO 63119-2044, Ph: (573) 424-6779, E-mail: john@johncoffman.net

4. LiUNA believes that its intervention and participation in this proceeding would serve the public interest, and wishes to become a party to this case for all purposes.

WHEREFORE, LiUNA respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

/s/ John B. Coffman

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Attorney for LiUNA
Dated: April 14, 2016

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list of this case at the Missouri Public Service Commission, including the following, on this 14th day of April 2016.

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Missouri Public Service Commission
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Office of the Public Counsel
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