

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

In the Matter of The Empire District)
Electric Company's 2019 Triennial)
Compliance Filing Pursuant to)
4 CSR 240 – Chapter 22)

Case No. EO-2019-0049

MISSOURI DIVISION OF ENERGY
APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Economic Development – Division of Energy ("DE") and, pursuant to Missouri Public Service Commission ("Commission") Rule 4 CSR 240-2.075, respectfully requests that the Commission grant intervention to DE in the above-styled matter. For its Motion to Intervene, DE states as follows:

1. On September 20, 2018, The Empire District Electric Company ("Empire") filed an Application for Variance with the Commission requesting that the Commission grant it variances from certain requirements of the Commission's integrated resource planning rule, 4 CSR 240-22. Specifically, Empire seeks a variance from provisions of Commission Rules 4 CSR 240-22.030 and 4 CSR 240-20.094 related to Demand-Side Resource Analysis and Load Analysis and Forecasting of Electric Utility Resource Planning.

2. On September 20, 2018, the Commission issued an *Order Providing Notice, Establishing Intervention Deadline, and Directing Response* which established an intervention deadline of no later than October 10, 2018.

3. 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.

4. DE expects to develop its positions on specific issues as this case proceeds.

5. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned with a copy to DEDEnergyCases@ded.mo.gov.

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

Respectfully submitted,

/s/ Brian Bear

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**Attorney for Missouri Department of
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Energy**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 10th day of October, 2018.

/s/ Brian Bear

Brian Bear