

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

In the Matter of Missouri-American Water)
Company’s Request for Authority to)
Implement General Rate Increase for) Case Nos. WR-2024-0320 and
Water and Sewer Service Provided in) SR-2024-0321
Missouri Service Areas)

MOTION TO INTERVENE

COMES NOW The Empire District Electric Company d/b/a Liberty (“Liberty”) and, pursuant to Missouri Public Service Commission (“Commission”) Rule 20 CSR 4240-2.075 and the Commission’s *Order Directing Notice, Establishing Time to Intervene, Setting Time to Respond, and Consolidating Cases* issued herein on July 2, 2024, respectfully submits this Motion to Intervene.

1. Liberty is a Kansas corporation with its principal office and place of business at 602 S. Joplin Ave., Joplin, Missouri, 64801. Liberty is qualified to conduct business and is conducting business in Missouri, as well as in the states of Arkansas, Kansas, and Oklahoma. Liberty is a “public utility” and, therefore, is subject to the general regulatory jurisdiction of the Commission as provided by law and is engaged, generally, in the business of generating, purchasing, transmitting, distributing, and selling electricity in portions of the referenced four states.

2. Liberty’s documents of incorporation from Kansas and certificate of authority from Missouri were previously filed with the Commission in Case No. EF-94-39. These documents are incorporated by reference. Liberty has no overdue Commission annual reports or assessment fees. There is no pending action or final unsatisfied judgment or decision against Liberty from any state or federal agency or court which involves customer service or rates, which action, judgment or decision has occurred within three years of the date of this filing.

3. Pleadings, notices, orders, and other correspondence concerning this matter should be addressed to the undersigned counsel.

4. Liberty's interest in this case arises from its status as a high-volume customer of Missouri-American Water Company ("MAWC"). As a MAWC customer, Liberty has an interest in rates, rate design, and regulatory issues that will be at issue in this proceeding, particularly as they relate to high volume, contract, and/or interruptible service relationships. Liberty's specific interest as a customer is different from the general public and each other party in the case, and this interest cannot be adequately represented by any other party.

5. As both a utility and a MAWC customer, Liberty's interests are different from that of the general public and may be adversely affected by a final order arising in this case. In addition, granting Liberty's proposed intervention would serve the public interest by providing the Commission with information and insights based on Liberty's expertise and unique perspective as a multi-service utility and a high-volume water customer.

6. At this time, Liberty is reviewing MAWC's initial filings and is unsure of the positions it will take in this case.

WHEREFORE, Liberty respectfully requests that the Commission grant its Motion to Intervene and that it be made a party hereto with all rights to participate in this matter.

Respectfully submitted,

/s/ Diana C. Carter

Diana C. Carter MBE #50527

Liberty Utilities

428 E. Capitol Ave., Suite 303

Jefferson City, Missouri 65101

Joplin Office Phone: (417) 626-5976

Cell Phone: (573) 289-1961

E-Mail: Diana.Carter@LibertyUtilities.com

Certificate of Service

I hereby certify that the above document was filed in EFIS on this 19th day of July, 2024, with notice of the same sent to all counsel of record.

/s/ Diana C. Carter