

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

In the Matter of Request of The Empire District)	
Electric Company d/b/a Liberty for Authority)	
to File Tariffs Increasing Rates for Electric)	File No. ER-2024-0261
Service Provided to Customers in its)	
Missouri Service Area)	

**APPLICATION TO INTERVENE BY THE
EMPIRE DISTRICT RETIRED MEMBERS & SPOUSES ASSOCIATION, LLC**

COMES NOW, the Empire District Retired Members & Spouses Association, LLC (EDRA), by and through counsel, pursuant to Missouri Public Service Commission (“Commission”) rule 4 CSR 2420-2.075, and files its Motion to Intervene in the referenced case.

In support thereof, EDRA states as follows:

1. On November 6, 2024, The Empire District Electric Company d/b/a Liberty (“Liberty”) filed tariffs designed to increase the electric rates to customers served in its Missouri service area.
2. On November 8, 2024, the Commission issued its *Order Giving Notice, Setting a Deadline to Intervene, Setting a Deadline to Respond to the Test Year, and Setting a Procedural Conference*, which set an intervention deadline of November 27, 2024.
3. EDRA consists of retirees of Liberty and their spouses; retirees who have earned, during their careers at Empire, certain post-career benefits, including, but not limited to, pensions and health care. These future benefits were integral to and were consideration promised in exchange for work already performed by the retirees.

4. Correspondence, communications, orders, and the decision in this matter should be addressed to:

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5. EDRA's interest is different than those of the general public and which may be adversely affected by a final order from this Commission in this case. EDRA wishes to ensure that its members' earned benefits are preserved for the future, and not discounted or otherwise inappropriately modified. Such interest is not currently represented in the case at this time.

6. EDRA takes no position on the filing at this time but is reviewing the pre-filed testimony and will participate in discovery as necessary to develop its position on specific issues as the case develops.

7. Granting intervention to the EDRA would serve the public interest by allowing the EDRA to examine the issues that are significant from a policy and public interest from their unique perspective.

8. EDRA has been granted intervenor status by the Commission in previous Liberty rate cases and has actively participated in those proceedings.

WHEREFORE, the EDRA prays that this Commission issue an order granting its application to intervene in this proceeding and for such other orders and relief as may be appropriate in the circumstances.

Respectfully Submitted,

By: /s/ Terry M. Jarrett

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ATTORNEYS FOR EDRA

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 15th day of November, 2024.

/s/ Terry M. Jarrett