

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

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

**APPLICATION TO INTERVENE**

**COMES NOW**, International Brotherhood of Electrical Workers Local Union No. 1474 (“Local 1474”), by and through its counsel, Blake & Uhlig, P.A., and respectfully submits this Application to Intervene in the above-referenced matter pursuant to Missouri Public Service Commission (“Commission”) Rule 20 CSR 4240-2.075. In support thereof, Local 1474 states as follows:

1.       Local 1474 is a voluntary organization doing business and representing employees in the State of Missouri. Local 1474 is a labor organization as defined in the National Labor Relations Act, as amended, 29 U.S.C. § 152, *et. seq.* Local 1474 has a collective bargaining agreement with The Empire District Electric Company d/b/a Liberty (“Liberty”) and represents certain employees employed by Liberty.

2.       The name, address, telephone number, and e-mail address of the party seeking to intervene is:

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3. Local 1474 requests that service be made to its counsel of record.

4. On November 6, 2024, the Empire District Electric Company d/b/a Liberty (“Liberty”) filed tariffs designed to increase the electric rates to customers in its Missouri service area. (Dkt. 31).

5. 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. (Dkt. 32). Local 1474’s Application to Intervene is therefore timely.

6. Local 1474 represents certain employees employed by Liberty working under a collective bargaining agreement, who may be affected by Orders entered by the Commission in this proceeding which may impact, directly or indirectly, terms and conditions of employment of the employees represented by Local 1474. Accordingly, Local 1474 and the employees it represents are interested parties in this proceeding, and Local 1474 and the employees it represents have a direct interest in this proceeding which is different from that of the general public. As the exclusive bargaining representative for certain employees employed by Liberty, Local 1474’s interest cannot be legally or adequately represented by any other party.

7. Local 1474 takes no position at this time regarding the relief sought by Liberty in File No. ER-2024-0261. Local 1474 cannot assert a position at this time because, currently, Local 1474 is not certain how the relief sought by Liberty may impact, directly or indirectly, the wages, benefits, and terms and conditions of employment of the employees that Local 1474 represents. Local 1474 is reviewing the filed testimony, and can assert a position after obtaining more information through the discovery and prehearing process, which it will participate in as

necessary in order to develop its position on specific issues. To the extent that the adjudication of File No. ER-2024-0261 may impact, directly or indirectly, the wages, benefits, and terms and conditions of employment of the employees that Local 1474 represents, Local 1474 reserves the right to participate in this proceeding as necessary to protect the interests of the employees it represents.

8. Local 1474 seeks permission to intervene in this proceeding pursuant to Commission Rule 20 CSR 4240-2.075.

9. No party to this proceeding will be adversely impacted or prejudiced by granting this Application to Intervene.

WHEREFORE, having stated the grounds for intervention, and its interest in this proceeding, the International Brotherhood of Electrical Workers Local Union No. 1474 hereby requests that the Commission:

- A. Grant it leave to intervene in this proceeding on its behalf and on behalf of the employees it represents and to be heard at such time as the Commission may fix; and
- B. In all respects make Local 1474 a party to this proceeding.

Dated, this 25<sup>th</sup> day of November, 2024.

Respectfully submitted,

**BLAKE & UHLIG, P.A.**

By: /s/ Michael E. Amash  
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ATTORNEY FOR IBEW LOCAL  
1474

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Application to Intervene was served upon the below parties by mail and e-mail, and was electronically filed using EFIS, this 25<sup>th</sup> day of November, 2024.

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