

**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)	<u>File No. ER-2024-0261</u>
Authority to File Tariffs Increasing Rates)	Tracking No. JE-2025-0069
for Electric Service Provided to Customers)	
In its Missouri Service Area)	

APPLICATION TO INTERVENE OF RENEW MISSOURI ADVOCATES

COMES NOW Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”), and pursuant to 20 CSR 4240-2.075, applies to intervene in the above-captioned case. For its *Application to Intervene* Renew Missouri states:

1. Renew Missouri is a non-profit corporation organized under the laws of Missouri with its principal place of business at 915 East Ash St, Columbia, MO 65201. Renew Missouri is a registered fictitious name of Renew Missouri Advocates under § 417.200, RSMo. Renew Missouri is a non-profit policy group whose mission is to transform Missouri into a leading state in renewable energy and energy efficiency.

2. As advocates for renewable energy and energy efficiency efforts in Missouri, Renew Missouri’s interests are different than those of the general public and may be adversely affected by a final order arising from this case if policies hindering those efforts are adopted.

3. Granting Renew Missouri intervention will serve the public interest by assisting the Commission’s record for decision in this case, and no party will be adversely affected by such intervention.

4. Renew Missouri has not yet taken a final position in this specific case based on the application and forthcoming evidence, but generally advocates for policies that promote the transition to more reliance on renewable energy, as well as energy efficiency efforts that encourage

energy savings, decreased reliance on fossil fuel generation, and increased affordability. Renew Missouri also advocates for sensible transmission policies that support increased reliability and access to renewable energy. Renew Missouri takes no position at this time regarding the relief sought by Liberty in File No. ER-2024-0261. Renew Missouri cannot assert a position at this time due to the recency of the case filing, and the inability to conduct discovery without being a party to the case. Currently, Renew Missouri is not certain how the relief sought by Liberty may impact, directly or indirectly, policies impacting energy efficiency efforts and/or the transition to renewable energy. Renew Missouri anticipates it will be able to assert a position in either its direct or responsive testimony, as appropriate, after reviewing and analyzing the filed testimony, and obtaining more information through the discovery process.

5. Pleadings, notices, and other correspondence in this case should be directed to:

Nicole Mers
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General Counsel

James Owen
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Executive Director

WHEREFORE, Renew Missouri respectfully requests that the Commission grant this *Application to Intervene*, along with any further relief the Commission deems proper.

Respectfully,

/s/ Nicole Mers

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GENERAL COUNSEL FOR RENEW
MISSOURI ADVOCATES

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 26th day of November 2024.

/s/ Nicole Mers