

**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 OF  
MIDWEST ENERGY CONSUMERS GROUP**

COMES NOW, the Midwest Energy Consumers Group, (“MECG”) and pursuant to 20 CSR 4240-2.075, applies to intervene in the above case. For its Application, MECG states:

1. Midwest Energy Consumers Group (“MECG”) is an incorporated entity representing the interests of large commercial and industrial users of electricity, water, and natural gas throughout the State of Missouri including in the areas served by Liberty-Empire Electric.
2. On November 6<sup>th</sup>, Liberty-Empire filed tariff sheets designed to implement a general rate increase of approximately \$92 million or 15.99% for its electric services. The matters to be considered in this case and the Commission’s determinations thereon, could have a direct and significant impact on the cost of service of the large commercial and industrial customers.
3. As a representative of large user customers of Liberty-Empire, the MECG has a direct and immediate interest in these proceedings that is different from that of the general public. While MECG does not at this time have sufficient information to assert a position in this case, it reserves the right to assert positions after they have had an adequate opportunity to examine the record, and any documentation of other parties filed herein. In general, MECG opposes excessive ROE, supports cost-based allocation of any revenue requirement, and opposes unlawful and unreasonable special ratemaking accounting and mechanisms that distort the balance between the

utility and its customers. In addition to positions it may take in pre-filed testimony, MECG anticipates adopting formal positions on the issues in its position statements that may be filed in this case.

4. Pleadings, notices and other correspondence in this case should be directed to undersigned counsel.

WHEREFORE, MECG respectfully requests that the Commission issue its order granting its Application to Intervene and that it be made a party hereto with all rights to participate in this matter.

Respectfully,

**/s/ Tim Opitz**

Tim Opitz, Mo. Bar No. 65082

Opitz Law Firm, LLC

308 E. High Street, Suite B101

Jefferson City, MO 65101

T: (573) 825-1796

[tim.opitz@opitzlawfirm.com](mailto:tim.opitz@opitzlawfirm.com)

ATTORNEY FOR MIDWEST  
ENERGY CONSUMERS GROUP

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 27<sup>th</sup> day of November 2024:

**/s/ Tim Opitz**

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