

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

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| In the Matter of the Application of White River |) | |
| Valley Electric Cooperative, Inc. for Approval |) | Case No. EO-2025-0228 |
| of Designated Service Boundaries Within |) | |
| Portions of Christian County, Missouri |) | |

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 and Notice* issued herein on February 27, 2025, 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 the fact that it would be the electric service supplier to the property which is the subject of the Application of White River Valley Electric Cooperative, Inc. ("White River"), absent a Commission decision in favor of White River in this docket. As such, Liberty's interest is 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 regulated utility.

5. At this time, Liberty is reviewing White River's Application and is unsure of the positions it will take in this case. Pursuant to Rule 20 CSR 4240-2.075(2)(F), Liberty states that it cannot state its positions at this time because further review, investigation, and discovery is needed for determinations to be made regarding the factors to be considered by the Commission in a docket such as this one. Liberty anticipates being able to state its positions in 60 days or as required by any procedural schedule which is established in the docket.

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

The Empire District Electric Company d/b/a Liberty

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 13th day of March, 2025, with notice of the same sent to all counsel of record.

/s/ Diana C. Carter