

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

**APPLICATION TO INTERVENE BY THE CONSUMERS COUNCIL OF MISSOURI**

COMES NOW the Consumers Council of Missouri ("Consumers Council" or "CCM"), by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075 and applies for intervention as a party to this case, which involves proposed rate increases by The Empire District Electric Company d/b/a Liberty ("Company" or "Liberty").

In support of this application, Consumers Council states as follows:

1. Consumers Council is a non-governmental, nonpartisan, nonprofit corporation that is dedicated to educating and empowering consumers statewide and to advocating for their interests. Consumers Council of Missouri was originally founded in 1971 as Utility Consumers Council of Missouri. Consumers Council has participated in numerous rate cases at the Missouri Public Service Commission ("Commission").
2. Correspondence, communications, orders and the decision in this matter should be addressed to:

John B. Coffman  
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3. Consumers Council's interest in this matter relates to the way Liberty's request may affect the rates, terms and conditions of service for residential electric customers, including low-income and low-use customers, as well as the health and safety of vulnerable customers. This interest is different and distinct from the general public interest, and this interest could be harmed as a result of granting Liberty's request in this matter.

4. Consumers Council is opposed to increases to this utility's revenue requirement, if those increases are based on unjust or unreasonable actions. Consumers Council supports a thorough audit of a historical test year for the utility in this rate case. Consumers Council is generally opposed to unfair or discriminatory cost allocations. Consumers Council is opposed to an unreasonable residential rate design.

Consumers Council wishes to become a party to this case, so that it may engage in discovery to further explore these issues with regard to the specific evidence in this matter. Consumers Council reserves the right to provide the Commission with its detailed positions in this case, following further review of the testimony, discovery responses, and other materials.

5. Consumers Council is also concerned about the accuracy of information that the public has thus far received about the potential consumer rate impact for the relief that Liberty is requesting in this case. In this regard, Consumers Council supports the "Motion for an Order Directing Liberty to Issue a New Press Release to Correct its Prior Press Release", which was filed yesterday (March 20, 2025) in this matter by the Office of the Public Counsel.

6. Consumers Council believes that its intervention and participation in this proceeding would serve the public interest, and wishes to become a party to this case for all purposes.

WHEREFORE, Consumers Council respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

/s/ John B. Coffman

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Attorney for Consumers Council of Missouri

Dated: March 21, 2025

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list on this 21<sup>st</sup> day of March 2025.

/s/ John B. Coffman

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