

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

In the Matter of the Empire District Electric)
Company, Liberty Utilities (Central) Co., and)
Liberty Sub Corp Concerning an Agreement and) Case No. EM-2016-0213
Plan of Merger and Certain Related Transactions)

APPLICATION TO INTERVENE

COME NOW International Brotherhood of Electrical Workers, Local Unions No. 1464 and 1474, (“Locals 1464 and 1474” or the “Locals”) by and through their counsel, Blake & Uhlig, P.A., and respectfully submit this Application to Intervene pursuant to 4 CSR 240-2.075 of the Missouri Public Service Commission’s Rules of Practice and Procedure. In support of this Application, the Locals state as follows:

1. Locals 1464 and 1474 are voluntary organizations doing business and representing employees in the State of Missouri. The Locals are also labor organizations as defined in the National Labor Relations Act, as amended, 29 U.S.C. § 152, *et seq.* The Locals have separate collective bargaining agreements with Empire District Electric Company (“Empire”).

2. The names, addresses and telephone numbers of the Locals seeking leave to intervene are:

Darrell McCubbins, Business Manager
IBEW Local Union No. 1464
P.O. Box 33443
Kansas City, Missouri 64120
(816) 231-1464

Jim Evans, Business Manager
IBEW Local Union No. 1474
P.O. Box 1104
Joplin, Missouri 64804
(417) 483-4878

Counsel: Michael E. Amash
Blake & Uhlig, P.A.
753 State Avenue, Suite 475
Kansas City, Kansas 66101
(913) 321-8884

3. The Locals request that service be made to the Locals' counsel.

4. On March 16, 2016, Empire, Liberty Utilities (Central) Co. ("LU Central"), and Liberty Sub Corp. filed a joint application asking the Missouri Public Service Commission (the "Commission") to approve a transaction in which LU Central would acquire all of the common stock of Empire.

5. On March 17, 2016, the Commission issued an Order and Notice directing that interested parties wishing to intervene must do so on or before April 14, 2016. This Application is therefore timely.

6. The Locals represent employees of Empire, who may be affected by Orders entered by the Commission in this proceeding to the extent that it may impact, directly or indirectly, on the terms and conditions of employment of the employees that the Locals represent. In particular, any potential merging of bargaining units may affect the seniority of said employees. Accordingly, the Locals and the employees they represent have a direct interest in this proceeding which is different from that of the general public, and which cannot be adequately represented by any other party.

7. The Locals have no current position regarding the Empire and LU Central's Application in this proceeding. However, to the extent that said Application may impact, directly or indirectly, on the wages, benefits, and terms and conditions of employment of the employees that the Locals represent, the Locals reserve the right to

participate in the proceedings to the extent necessary to protect the interests of their members.

8. The Locals seek permission to intervene in this matter pursuant to 4 CSR 240-2.075.

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

WHEREFORE, having stated the grounds for intervention, their position and interest in this proceeding, the International Brotherhood of Electrical Workers, Local Unions No. 1464 and 1474 hereby request that the Commission:

- A. Grant them leave to intervene in these proceedings on their behalf and on behalf of their members and to be heard at such time as the Commission may fix; and
- B. In all respects be a party to this proceeding.

Dated, this 14th day of April, 2016.

Respectfully submitted,

BLAKE & UHLIG, P.A.
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By: /s/ Michael E. Amash

ATTORNEYS FOR IBEW LOCALS
1464 AND 1474

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *Application to Intervene* was served upon all parties to this action, either by email and electronically filed using EFIS, this 14th day of April, 2016.

/s/ Michael E. Amash
Attorney for IBEW 1464 and 1474