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March 1, 2006

FILED<sup>4</sup>

MAR 02 2006

Public Service Commission  
Governor Hotel  
200 Madison Street  
Jefferson City, MO 65102

Missouri Public  
Service Commission


RE: *In the Matter of Empire District Electric Company's Application for Authority to File Tariffs Increasing Electric Rates for the Service Provided to Customers,*  
Case No. ER-2006-0315

Dear Sir/Madam:

Enclosed for filing please find an original and 9 copies of Missouri Department of Natural Resources' Application to Intervene in the above-styled matter. Please stamp "filed" on the extra copy for my files. Thank you.

Sincerely,

JEREMIAH W. (JAY) NIXON  
Attorney General

  
SHELLEY A. WOODS  
Assistant Attorney General

SAW:mf  
Enclosure  
c: Counsel of Record  
Anita Randolph, MDNR/EC

**FILED<sup>4</sup>**

**MAR 02 2006**

**STATE OF MISSOURI**  
**PUBLIC SERVICE COMMISSION**

**Missouri Public  
Service Commission**

In the Matter of Empire District Electric Company's )  
Application for Authority to File Tariffs Increasing )  
Electric Rates for the Service Provided )  
to Customers )

Case No. ER-2006-0315

**MISSOURI DEPARTMENT OF**  
**NATURAL RESOURCES**  
**APPLICATION TO INTERVENE**

The Missouri Department of Natural Resources (MDNR), pursuant to 4 CSR 240-2.075, respectfully requests that the Commission grant its application to intervene in the above-styled matter. This application is made for the following reasons:

1. On February 1, 2006, Empire District Electric Company (the Company) filed with the Missouri Public Service Commission (PSC) its application for authority to file tariffs to effectuate a general rate increase for electric service.
2. On February 7, 2006, the PSC issued a Suspension Order and Notice advising parties interested in the above-styled case to file motions to intervene no later than March 7, 2006.
3. MDNR, and specifically its Energy Center, is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.
4. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that the Energy Center will be looking at the proposed filing from a formal policy and planning perspective as well as looking at the

potential impacts on environmental quality. In particular, the Energy Center will look at the proposed filing to assess the commitment by the Company to provide low or no cost weatherization to low income families. The Energy Center's review also will be in relation to the mandate set forth in Section 640.150, RSMo. The mandate set forth in the statute includes planning for energy resource development; analyzing energy management issues; consulting and cooperating with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; assessing the potential impacts on environmental quality; and analyzing the potential for increased use of energy alternatives and making recommendations for the expanded use of such alternate energy sources and technologies.

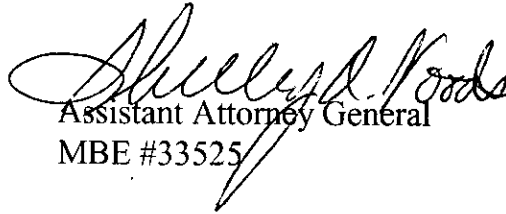
5. The Energy Center takes no position on the filing as filed, but would welcome the opportunity to work with the Company, Staff and the Office of Public Counsel to explore whether the Company is interested in developing energy efficiency programs that have meaningful benefits to consumers and the environment.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

JEREMIAH W. (JAY) NIXON

SHELLEY A. WOODS



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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid, by United States mail, this 2<sup>ND</sup> day of March, 2006, to:

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Office of Public Counsel  
P.O. Box 2230  
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