

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of The Empire)
District Electric Company for Approval of Its)
Customer Savings Plan) File No. EO-2018-0092

APPLICATION TO INTERVENE OF SIERRA CLUB

Come now Sierra Club, and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, Sierra Club states the following:

1. On October 31, 2017, Empire District Electric Company (“Empire”) filed its application for approval of its Customer Savings Plan. The Commission set an intervention deadline of November 22.

2. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 800,000 members nationally and over 11,500 members in Missouri, many of whom are Empire ratepayers. These members are directly affected by the rates, policies, terms, and conditions governing Empire’s provision of electricity to them. As a result, these members have a strong interest in having their electricity provided in a dependable and environmentally responsible manner, and at costs that are competitive over the long term. These interests are implicated by the Customer Savings Plan.

3. The Missouri Chapter of Sierra Club has an office at 2818 Sutton Blvd, St. Louis, MO 63143; email john.hickey@sierraclub.org; telephone 314-644-1011. Sierra Club is dedicated to exploring, enjoying, and protecting the wild places of the earth; to practicing and promoting the responsible use of the earth’s ecosystems and resources; to educating and enlisting humanity to protect and restore the quality of the natural and human environment; and to using all lawful means to carry out these objectives. Sierra Club has many years of experience working on energy and electric generation issues throughout the United States, including in Missouri. Since 2004,

Sierra Club has participated in numerous dockets before the Commission ranging from rate cases to integrated resource planning proceedings to energy efficiency dockets.

4. Sierra Club, on behalf of its ratepayer members, is interested in thoroughly reviewing the Customer Savings Plan, which at first blush appears to be a positive step for its members and the environment. Sierra Club supports the retirement of coal-fired power plants and their replacement with renewable energy and energy efficiency programs.

5. Correspondence, communications, orders, and decisions may be sent to:

Henry B. Robertson (Mo. Bar No. 29502)
Great Rivers Environmental Law Center
319 N. Fourth Street, Suite 800
St. Louis, Missouri 63102
(314) 231-4181
(314) 231-4184 (facsimile)
hrobertson@greatriverslaw.org

6. Sierra Club is not yet certain of the position it will take in this case.

7. Sierra Club's interests in low-cost, clean energy generation and environmental protection are distinct from those of the public at large and may be adversely affected by the merger. Sierra Club is uniquely situated to represent the interests of its members in this proceeding as a result of its expertise and experience in energy policy and law, and environmental regulations that affect the market for energy generation.

8. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, Sierra Club respectfully requests the Public Service Commission to grant the application to intervene.

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Attorney for applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 21st day of November, 2017, to all counsel of record:

/s/ Henry B. Robertson
Henry B. Robertson