

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

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

**APPLICATION TO INTERVENE BY THE
EMPIRE DISTRICT RETIRED MEMBERS & SPOUSES ASSOCIATION**

COMES NOW, the Empire District Retired Members & Spouses Association (EDRA),
by and through their attorney, Douglas L. Healy, of Healy Law Offices, LLC, pursuant to
Missouri Public Service Commission (“Commission”) rule 4 CSR 240-2.075, and files its
Motion to Intervene in the referenced case. In support thereof, EDRA states as follows:

1. On March 16, 2016, The Empire District Electric Company (“Empire”) and Liberty Utilities (Central) Co. (“Liberty”) and Liberty Sub Corp. filed a joint application asking the Commission to approve a transaction in which LU Central would acquire all of the common stock of Empire.
2. On March 16, 2016, the Commission issued its Order Directing Notice and Setting Intervention Date, which set an intervention deadline of April 14, 2016.
3. EDRA is composed of retirees of Empire and their spouses; retirees who have earned, during their careers at Empire, certain post-career benefits, including, but not limited to, pensions and health care. These future benefits were integral to and were consideration promised in exchange for work already performed by the retirees.
4. EDRA’s interest is different than those of the general public and which may be adversely affected by a final order from this Commission in this case. EDRA wishes to ensure that its members’ earned benefits are preserved for the future, and not

discounted or otherwise inappropriately modified. Such interest is not currently represented at this time.

5. EDRA expects to develop its position on specific issues as the case develops, and takes no position on the filing at this time.
6. Granting intervention to the EDRA would serve the public interest by allowing the EDRA to examine the issues that are significant from a policy and public interest from their unique perspective.

WHEREFORE, the EDRA prays that this Commission issue an order granting its application to intervene in this proceeding and for such other orders and relief as may be appropriate in the circumstances.

Respectfully Submitted,

By: /s/ Douglas L. Healy
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ATTORNEYS FOR EDRA

CERTIFICATE OF SERVICE

I hereby certify that the foregoing application to intervene was served electronically to the following interested persons on this 31st day of March, 2016:

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