

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of The Empire Dis-)
trict Electric Company's 2013 Tri-) File No. EO-2013-0547
ennial Compliance Filing Pursuant)
to 4 CSR 240-22)

APPLICATION TO INTERVENE
OF MIDWEST UTILITY USERS' ASSOCIATION

COMES NOW MIDWEST ENERGY USERS' ASSOCIATION ("MEUA")
and for its Application to Intervene in this matter pursuant to 4
CSR 240-2.075 states:

1. MEUA is an unincorporated voluntary association consisting of large commercial and industrial users of natural gas and electricity served by The Empire District Electric Company ("Empire"). MEUA was formed for the purpose of group representation of its members' interests through intervention and other activities in regulatory and other appropriate proceedings.^{1/}

2. MEUA's and its participants' interests in proceedings affecting the rates, terms and conditions of electric service from Empire has been recognized by the Missouri Public Service Commission in permitting intervention in several rate design and electric rate proceedings concerning Empire including

^{1/} Empire customers potentially affected (and participating in this intervention at this time) are: Praxair, Inc; Explorer Pipeline Company. Should additional entities join, undersigned counsel commits to seasonably submit an additional application thereby permitting the Commission and other parties to consider the appropriateness of such intervention.

without limitation the last Empire rate increase case and prior Empire proceedings under this section of the Commission's rules.

3. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

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4. MEUA participants are interested in this proceeding and its possible impact on the ultimate rates, terms and conditions of service, Demand Side Management surcharges, and alternative capacity provision measures and their operational impact. As large industrial electric customers of Empire, MEUA members may be directly affected by changes in Empire processes and future plans and may be bound or adversely affected by any Commission order issued in this proceeding.

5. For purposes of 4 C.S.R. 240-2.075(2), MEUA opposes discriminatory pricing of electricity and related utility services, and opposes relief that is not reasonable, capacity plans that are not fully examined, and planning that is not well documented as related to prudent actions by the utility in providing utility service. As MEUA representatives have not fully studied the voluminous and specific proposals that form the core issues in this proceeding, they cannot state a more definitive position at this time.

WHEREFORE, MEUA prays (without prejudice to later requests for relief): (a) that through MEUA its participants be permitted to intervene herein and be made parties hereto with all rights to have notice of and participate in hearings to present evidence, cross-examine witnesses, file briefs and participate in argument, should any be had; and (b) for all other needful and proper relief appropriate in the premises.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



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ATTORNEYS FOR MIDWEST ENERGY USERS'
ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Application for Leave to Intervene by electronic mail addressed to the attorneys of record herein as made available by the Secretary of the Commission through EFIS.



Stuart W. Conrad

July 19, 2013