

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

In the Matter of The Empire District Electric)
Company's 2013 Triennial Compliance Filing) Case No. EO-2013-0547
Pursuant to 4 CSR 240-22)

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

COMES NOW Missouri Department of Natural Resources ("MDNR")
and, pursuant to 4 CSR 240-2.075, respectfully requests that the Commission
issue its order granting MDNR's Application to Intervene. For its Application,
MDNR states as follows:

1. On July 1, 2013, The Empire District Electric Company ("Empire")
filed its 2013 Integrated Resource Plan (IRP) with the Missouri Public Service
Commission ("Commission"). On July 2, 2013, the Commission issued an *Order*
Directing Notice and Setting Date for Submission of Intervention Requests. In
its July 2, 2013 Order the Commission established an intervention deadline of
July 23, 2013.

2. MDNR, and specifically its Division of Energy, is a state agency
vested with the powers and duties set forth in § 640.150 RSMo.

3. MDNR has an interest different than that of the general public,
and its intervention will serve a public interest in that the Division of Energy
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. The Division of Energy's review will also relate to the mandate set forth in § 640.150 RSMo which 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.

4. Communications, correspondence, orders and decision in this matter should be addressed to:

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5. MDNR is uncertain at this time of the position it will take in this case.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that the Commission grant its request for intervention in the above-styled matter.

Respectfully submitted,

CHRIS KOSTER
Attorney General

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Natural Resources**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 17th day of July, 2013.

/s/ Jeremy D. Knee
Jeremy D. Knee
Assistant Attorney General