

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

In re: The Empire District Electric)
Company's 2013 Triennial Compliance)
Filing pursuant to 4 CSR 240 - Chapter 22)

Case No. EO-2013-0547

**APPLICATION TO INTERVENE BY THE
MISSOURI JOINT MUNICIPAL ELECTRICAL UTILITY COMMISSION**

COMES NOW, the Missouri Joint Municipal Electric Utility Commission ("MJMEUC"), by and through their attorney, Douglas L. Healy, Healy & Healy, Attorneys at Law, 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, MJMEUC states as follows:

1. On July 1, 2013, The Empire District Electric Company ("Empire") filed its Integrated Resource Plan ("IRP"), which is required by the Commission's Integrated Resource Planning Rule, 4 CSR 240-22.
2. Applications to Intervene in this case are due July 23, 2013, pursuant to a Commission Order issued July 2, 2010.
3. The MJMEUC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 et seq. RSMo., with authority to exercise public powers of a political subdivision of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MJMEUC. Sixty seven Missouri municipalities are current parties to the joint contract establishing the MJMEUC.

4. The MJMEUC has an interest that is different from that of the general public, in that it represents the interest of municipal electrical systems throughout the state, as well as municipal electrical systems that take transmission through the Southwest Power Pool, of which Empire is a member. Additionally, the city of Monett is directly connected to Empire's transmission system. Such interest is not currently represented in the proceedings.
5. The MJMEUC takes no position at this time.
6. Granting intervention to the MJMEUC would serve the public interest by allowing the MJMEUC's experience and insight to be part of the Integrated Resource Planning process.

WHEREFORE, the MJMEUC 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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ATTORNEY FOR MJMEUC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing application to intervene was served by electronically mailing a copy to the attorneys of record this 23rd day of July, 2013:

/s/ Douglas L. Healy
Douglas L. Healy