

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of)	
Kansas City Power & Light Company's)	File No. ER-2014-0370
Request for Authority to Implement)	
a General Rate Increase for Electric Service)	

APPLICATION TO INTERVENE OF SIERRA CLUB

Comes 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. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 600,000 members nationally and some 8,600 members in Missouri, many of whom reside in Kansas City Power & Light's ("KCP&L") Missouri service territory and are KCP&L ratepayers. 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's mission is to explore, enjoy, and protect the wild places of the earth and educate and enlist humanity to protect and restore the quality of the natural and human environment. Consistent with this mission, Sierra Club for many years has advocated for transitioning the electricity sector from coal-fired generation to cleaner and lower-cost forms of energy, such as energy efficiency and renewable energy sources. Sierra Club's interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if KCP&L aggressively pursues renewable energy, energy efficiency, and demand response programs that displace fossil fuel generation. Sierra

Club is concerned with the build-up of greenhouse gases that lead to global warming, and with pollution from non-renewable sources that cause a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, respiratory problems, and other problems.

2. Sierra Club was a party to KCP&L's last rate case, ER-2012-0174, its IRP docket, EO-2012-0323, and its 2013 and 2014 updates. Sierra Club is also party to a settlement ("Collaboration Agreement") with KCP&L arising out of case No. EO-2005-0329, entered into in March 2007, which includes matters that may still be of relevance in this rate case.

3. Sierra Club's interest in promoting cleaner and lower-cost forms of energy is different from that of the general public and could be adversely affected by an order authorizing KCP&L to recover in rates the costs of environmental retrofits to aging coal-fired EGUs, inadequate levels of DSM programs or an unreasonable demand-side investment mechanism, or continued utilization of excess coal-based generating capacity where more prudent and cost-effective alternatives exist.

4. Applicant is not yet certain of the position it will take in this case.

5. Sierra Club's intervention in this docket will serve the public interest. Sierra Club brings unique perspective and expertise in evaluating proposed investments in coal-fired generation as compared with cleaner, lower-cost alternatives that will assist the Commission and parties in fully evaluating the issues presented by this case.

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

/s/ Henry B. Robertson
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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 18th day of November, 2014, to all counsel of record:

/s/ Henry B. Robertson
Henry B. Robertson