

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of KCP&L Greater Missouri)
Operations Company’s Notice of Intent to File an) File No. EO-2015-0241
Application for Authority to Establish a Demand-)
Side Programs Investment Mechanism)

MOTION TO INTERVENE OF NRDC

Comes now the Natural Resources Defense Council (“NRDC”), and pursuant to 4 CSR 240-2.075, applies to intervene herein.

1. NRDC participated in the MEEIA rulemaking and is a party to the GMO stipulation in case no. EO-2012-0009. It is also on the stakeholder advisory groups for GMO and KCP&L.

2. **NRDC** is a nonprofit corporation organized under the laws of New York with a Midwest office at 20 North Wacker Drive, Suite 1600, Chicago, IL 60606; contact Ashok Gupta at that address or at 212-243-4351. It has over 4,800 members in Missouri, many of whom are KCPL ratepayers. NRDC and its members are interested in promoting energy efficiency, peak demand reduction and renewable energy resources to meet Missouri’s energy needs. NRDC seeks to intervene in this proceeding in order that its members and others may benefit from well designed and cost-effective energy efficiency programs. NRDC will bring significant expertise to this proceeding. The Staff of NRDC has extensive history with the design and implementation of utility programs and policies designed to deploy energy efficiency and peak demand reduction to benefit the public. NRDC has intervened and/or provided testimony on these issues in public utility

commission proceedings in many states, including Missouri, Illinois, Michigan, Ohio, Wisconsin, New York, Oregon, Iowa, New Jersey and California. NRDC has regularly presented testimony before the US Congress and various state legislatures related to the electric utility industry's use of energy efficiency resources, rate design, utility planning and other topics relevant to this proceeding.

3. Movant's interests focus on environmental protection and hence are different from those of the general public and could be adversely affected by an order approving inadequate levels of DSM programs or an unreasonable demand-side investment mechanism.

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

5. Movant submits that it will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, the Natural Resources Defense Council 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 8th day of September, 2015, to all counsel of record:

/s/ Henry B. Robertson
Henry B. Robertson