

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Application of Kansas City Power & Light Company)
For the Opening of a Proceeding to File Status Report) **Case No. EO-2008-0224**
On Wind Investments)

**MOTION OF SIERRA CLUB AND CONCERNED CITIZENS OF PLATTE COUNTY
FOR LATE INTERVENTION**

On January 14, the Commission opened a docket and set an intervention deadline of February 4 to consider KCPL's status report on wind investments. Movants now respectfully ask leave under 4 CSR 240-2.075 to intervene late and in support of their motion state:

1. Sierra Club is a nonprofit corporation incorporated in California and with members in Platte County and the rest of Missouri. Concerned Citizens of Platte County is a nonprofit corporation under the laws of Missouri. Both were parties to the proceedings leading up to the Regulatory Plan approved in Case No. EO-2005-0329 but not to the Stipulation and Agreement adopting that plan.

2. Movants have an interest in the case which is different from that of the general public in that they are parties to a settlement agreement with KCPL that was arrived at in the course of litigation arising out of Case No. EO-2005-0329.

3. Movants are unsure of the position they would take in this case.

4. Movants' reason for intervening is to protect their interests in their settlement with KCPL and particularly in the portions of that settlement related to the wind investments in question.

5. As good cause for late intervention, Movants state that they did not think it necessary to intervene since they were not parties to the Stipulation and Agreement in Case No. EO-2005-0329, and were monitoring their settlement with KCPL, but now feel the need to be fully informed of the developments that gave rise to this case as they affect that settlement.

6. Movants will take no action that would cause a delay in this case as a result of their late intervention. Their participation would serve the public interest in renewable energy.

WHEREFORE Sierra Club and Concerned Citizens of Platte County respectfully request the Public Service Commission to grant this motion 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 sent by email this 21st day of February, 2008, to counsel for the Commission, KCPL, OPC, and intervenors MDNR and Praxair.

/s/ Henry B. Robertson
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