

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

In the matter of Kansas City Power)	
& Light's Application for Approval of)	
Demand-Side Programs and for Authority)	Case No. EO-2012-0008
to Establish a Demand-Side Programs)	
Investment Mechanism)	

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

COMES NOW Missouri Department of Natural Resources (MDNR)
and, pursuant to Commission Rule 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 December 22, 2011, Kansas City Power & Light (KCP&L)
filed an application for approval of demand-side programs and for authority
to establish a demand-side programs investment mechanism with the
Missouri Public Service Commission (PSC). The PSC opened Case No. EO-
2012-0009 to consider KCP&L's application and on December 23, 2011, issued
an order directing notice and establishing a deadline for requests to
intervene. The Order sets a January 13, 2012 deadline for interested parties
to intervene, and a January 17, 2012 pre-hearing conference
2. MDNR, and specifically its Division of Energy, is a state agency
vested with the powers and duties set forth in Section 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 also will be in relation to the requirements set forth in rules 4 CSR 240-3.163-4, which lists the information that an electric utility must provide when it seeks to establish a Demand-Side Programs Investment Mechanism (DSIM) and to seek approval, modification or discontinuance of demand-side programs. MDNR has a strong interest in encouraging energy efficiency through cost-effective demand-side programs and this interest can be significantly furthered through DSIM filings made under these rules.

4. MDNR has not determined the specific position it will take in this case; however, the Division of Energy has an interest in participating in this matter.

5. MDNR has requested access to Highly Confidential versions of filings and been advised by KCP&L that they will not be provided until MDNR has been made a party.

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

Jennifer S. Frazier
Deputy Chief Counsel
Agriculture & Environment Division
Missouri Attorney General's Office
P.O. Box 899
Jefferson City, Missouri 65102
Phone: 573-751-8795; Fax: 573-751-8796
Jenny.Frazier@ago.mo.gov

with a copy to:

Mary Ann Young
Legal Counsel, Division of Energy
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City MO 65102
Phone: 573-526-7052; Fax: 573-526-7553
Email: DNREnergyCases@dnr.mo.gov

WHEREFORE, the Missouri Department of Natural Resources
respectfully requests that the Commission grant this Application to Intervene
as soon as possible.

Respectfully submitted,

CHRIS KOSTER
Attorney General

/s/ Jennifer S. Frazier
Jennifer S. Frazier
Deputy Chief Counsel
Agriculture & Environment Division
P.O. Box 899
Jefferson City, Missouri 65102
Bar No. 39127
573-751-8795
573-751-8796 (fax)
Jenny.Frazier@ago.mo.gov
**Attorney for Missouri Department of
Natural Resources**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 29th day of December, 2011.

/s/ Jennifer S. Frazier
Jennifer S. Frazier
Deputy Chief Counsel
Agriculture & Environment Division