

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of KCP&L Greater Missouri Operations     )  
Company’s Application for Approval of Demand-         )  
Side Programs and for Authority to Establish a         )  
Demand-Side Programs Investment Mechanism            )     **File No. EO-2012-0009**

**MOTION TO INTERVENE OF NRDC, SIERRA CLUB,  
AND RENEW MISSOURI**

Come now Sierra Club, Earth Island Institute d/b/a Renew Missouri, and the Natural Resources Defense Council (“NRDC”), and pursuant to 4 CSR 240-2.075, apply to intervene herein. In support of their motion to intervene, Sierra Club, NRDC and Renew Missouri state the following.

1. Sierra Club, NRDC and Renew Missouri were participants in the MEEIA rulemaking.

2. **Sierra Club** is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 700,000 members nationally, and members who reside in GMO’s service territory and are KCPL-GMO ratepayers. The Missouri Chapter of the Club has an office at 7164 Manchester, St. Louis, MO 63143; email john.hickey@sierraclub.org; telephone 314-644-1011. Sierra Club exists for the purposes of preserving and protecting environmental values, and for years has been actively concerned with protecting air and water quality throughout the state of Missouri. Sierra Club’s interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if GMO aggressively pursues energy efficiency and demand response programs that displace

fossil fuel generation. Sierra Club is concerned with the build-up of greenhouse gases which lead to global warming, and with pollution from non-renewable sources which cause a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, respiratory problems, and other problems. Sierra Club has been actively encouraging the use of energy efficiencies and renewable energy sources.

3. **NRDC** is a nonprofit corporation organized under the laws of New York with a Midwest office at 2 North Riverside Plaza, Suite 2250, Chicago, IL 60606; contact Rebecca Stanfield at that address or at 312-651-7910. It has over 6,000 members in Missouri as of this date, many of whom are KCPL-GMO 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, 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.

4. **Earth Island Institute** is a non-profit corporation organized under the laws

of California with approximately 120 members in Missouri. Its principal place of business is 2150 Allston Way, Suite 460, Berkeley, CA 94704. Earth Island has a Certificate of Authority for a Foreign Nonprofit granted by the Missouri Secretary of State. Earth Island provides fiscal sponsorship and other support to environmental projects working toward ecological sustainability. Supporting alternative energy resources—efficiency and renewable energy—is part of this mission. **Renew Missouri** is a registered fictitious name of Earth Island Institute under § 417.200, RSMo, by which Earth Island supports energy programs in Missouri. Renew Missouri supports aggressive implementation of cost-effective utility DSM programs and renewable energy generation and procurement. Its office is located at 910 E. Broadway, Suite 205, Columbia, MO 65201; [pj@renewmo.org](mailto:pj@renewmo.org).

5. Movants’ 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.

6. Movants are not yet certain of the position they will take in this case.

7. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, Sierra Club, Renew Missouri, and the Natural Resources Defense Council respectfully request the Public Service Commission to grant the application to intervene.

/s/ Henry B. Robertson  
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Attorney for applicants

#### **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 13th day of January, 2012, to all counsel of record:

/s/ Henry B. Robertson  
Henry B. Robertson