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

In the Matter of the Resource Plan of	)	
Kansas City Power & Light Company	)	Case No. EO-2012-0323

## 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 April 9, 2012, KCP&L Greater Missouri Operations Company (GMO) filed its Integrated Resource Plan (IRP) with the Missouri Public Service Commission (PSC). On April 12, 2012 the PSC issued its order setting May 3, 2012 as the deadline for interested parties to file applications to intervene.
- 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

mandate set forth in Section 640.150, RSMo, which includes planning for energy resource development; analyzing energy management issues; consulting and cooperating with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; assessing the potential impacts on environmental quality; and analyzing the potential for increased use of energy alternatives and making recommendations for the expanded use of such alternate energy sources and technologies.

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

Jessica L. Blome Missouri Attorney General's Office Assistant Attorney General P.O. Box 899 Jefferson City, Missouri 65102 573-751-3640 573-751-8796 (fax) Jessica.blome@ago.mo.gov

with a copy to:

Mary Ann Young Division of Energy Missouri Department of Natural Resources P.O. Box 176 Jefferson City MO 65102 Phone: 573-526-7052; Fax: 573-526-7553

Phone: 573-526-7052; Fax: 573-526-7553 Email: DNREnergyCases@dnr.mo.gov 5. MDNR is uncertain at this time of the position it will take in this case.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

CHRIS KOSTER Attorney General

/s/ Jessica L. Blome
Jessica L. Blome
Assistant Attorney General
P.O. Box 899
Jefferson City, Missouri 65102
Missouri Bar No. 59710
573-751-3640
573-751-8796 (fax)
Jessica.blome@ago.mo.gov
Attorney for Missouri Department of
Natural Resources

## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 1st day of May, 2012.

<u>/s/ Jessica L. Blome</u> Jessica L. Blome