

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

In the Matter Kansas City Power & Light	)	
Company's Practices Regarding Customer	)	Case No. EO-2013-0359
Opt-Out of Demand-Side Management	)	
Programs and Related Issues	)	

**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 January 18, 2013, Staff of the Missouri Public Service Commission (Staff) and Kansas City Power & Light Company (KCP&L) filed a Joint Application to Establish a Proceeding to Review Kansas City Power & Light Company's Practices Regarding Customer Opt-Out of Demand-Side Management Programs and Associated Programs' Costs and Revenue Impacts with the Missouri Public Service Commission (PSC). On February 19, 2013 the PSC issued its order setting March 1, 2013 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:

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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*

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### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served electronically on  
all counsel of record this 1st day of March, 2013.

*/s/ Jessica L. Blome*  
Jessica L. Blome