

**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     | ) | Case No. EO-2012-0009 |
| For Authority 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, KCP&L Greater Missouri Operations Company ("GMO") 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 GMO'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:

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

Respectfully submitted,

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Attorney General

/s/ Jennifer S. Frazier  
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**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 29<sup>th</sup> day of December, 2011.

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