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

In the Matter of KCP&L Greater Missouri	)	
Operations Company Submission of its 2013	)	File No. EE-2013-0453
Renewable Energy Standard (RES)	)	
Compliance Plan	)	

## 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 15, 2013, KCP&L Greater Missouri Operations
  Company ("GMO") filed its 2012 Annual Renewable Energy Standard
  Compliance Report pursuant to Public Service Commission Rule 4 CSR 24020.100. The Commission opened Case No. EE-2013-0453 and on April 16,
  2013, directed that notice be provided and that staff file a report of its review
  no later than May 30, 2013. The Order also directed that no later than May
  30, 2013, the Office of the Public Counsel, and any other interested person or
  entity, may file comments regarding the report.
- 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. In

addition, MDNR is tasked with certifying renewable energy resources pursuant to Section 393.1025(5) 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 report and plans from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. MDNR has a specific interest in encouraging renewable energy sources.
- 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. Counsel for MDNR has previously entered an appearance in this docket, but has been informed that access to Highly Confidential versions of filings in the Commission's Electronic Filing and Information System (EFIS) will not be authorized until MDNR has applied for intervention and been made a party to this case.
- 6. Communications, correspondence, orders and decision in this matter should be addressed to:

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with a copy 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,

## CHRIS KOSTER

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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 10th day of May, 2013.

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