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

In the Matter of Kansas City Power &	)	
Light Company's Request for Variance	)	File No. ET-2014-0027
From Portions of 4 CSR 240-20.065	)	Tariff No. JE-2014-0058

## MISSOURI DEPARTMENT OF NATURAL RESOURCES' APPLICATION TO INTERVENE

COMES NOW Missouri Department of Natural Resources ("MDNR"), by and through counsel, and, pursuant to 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 August 5, 2013, Kansas City Power & Light Company

  ("KCPL") submitted an application for Commission approval of its revised

  Net Metering Rider and Solar Photovoltaic Rebate Program Tariffs. KCPL's

  August 5 filing is related to the recent enactment of amendments to the

  Missouri Renewable Energy Standard, § 393.1030 RSMo, et.seq, effective

  August 28, 2013.
- 2. On August 6, 2013, the Commission issued an *Order Directing*Staff Recommendation and Establishing Time to Intervene or to Object to

  Tariff no later than August 21, 2013.
- 3. MDNR, and specifically its Division of Energy, is a state agency vested with the powers and duties set forth in § 640.150 RSMo.

4. 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 § 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.

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

Jeremy D. Knee Assistant Attorney General P.O. Box 899 Jefferson City, Missouri 65102 Phone: 573-751-6579

Fax: 573-751-8796

Email: Jeremy.knee@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: 573-751-3335 Fax: 573-526-7553

Email: DNREnergyCases@dnr.mo.gov

6. 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 the Commission grant its request for intervention in the above-styled matter.

Respectfully submitted,

## CHRIS KOSTER

Attorney General

/s/ Jeremy D. Knee
JEREMY D. KNEE
Missouri Bar No. 64644
Assistant Attorney General
P.O. Box 899
Jefferson City, Missouri 65102

Phone: 573-751-6579 Fax: 573-751-8796

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  $20^{\rm th}$  day of August, 2013.

/s/ Jeremy D. Knee
Jeremy Knee
Assistant Attorney General