

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

The State of the Missouri Public Service Commission,	)	
	)	
	)	
Complainant,	)	
	)	
v.	)	
	)	Case No. EC-2011-0250
KCP&L Greater Missouri Operations Company	)	
	)	
	)	
Respondent.	)	

**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 February 8, 2011, the Staff of the Missouri Public Service Commission ("Staff") filed its Complaint against KCP&L Greater Missouri Operations Company ("GMO") alleging that on January 28, 2011, GMO had filed a deficient Chapter 22 Integrated Resource Plan ("IRP") in Case No. EE-2009-0237, and violated a *Nonunanimous Stipulation and Agreement* ("Stipulation") between GMO, Staff and other parties. The Stipulation had been approved by the Commission on June 2, 2010.

2. On February 9, 2011, the Commission issued its ORDER GIVING NOTICE OF CONTESTED CASE AND DIRECTING ANSWER. The Order gave GMO until March 11, 2011 to file an Answer. The Order did not establish a deadline for intervention. On March 11, 2011, GMO filed its answer.

3. MDNR, and specifically its Energy Center, is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.

4. MDNR participated in Case No. EE-2009-0237, and was a signatory to the *Nonunanimous Stipulation and Agreement*. MDNR has an interest in ensuring that the provisions of the Stipulation are fulfilled, and it may be adversely affected by a final order in this case related to GMO's compliance with the terms of the Stipulation. MDNR has an interest different than that of the general public, and its intervention will serve a public interest. MDNR's participation here will be in relation to the mandate set forth in Section 640.150, RSMo. The mandate set forth in the statute 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:

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6. MDNR generally concurs in the allegations contained in Staff/s complaint.

MDNR has not made a final determination as to the position it will take in this matter.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that the Commission issue its order granting MDNR's Application to Intervene. in the above-styled matter.

Respectfully submitted,

CHRIS KOSTER  
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**Attorneys 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 24th day of March, 2011.

/s/ Jennifer S. Frazier  
Jennifer S. Frazier