

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

In The Matter of the 2009 Resource Plan)
Of KCP&L Greater Missouri Operations)
Company Pursuant to 4 CSR 240-22) Case No. EE-2009-0237

**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 5, 2008, KCP&L Greater Missouri Operations Company (Company) applied for waivers from select provisions of the Commission's rules governing electric utility integrated resource planning. By order dated December 11, 2008, the Commission established an intervention deadline of December 29, 2008.

2. MDNR, and specifically its Energy Center, 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 Energy Center 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 Energy Center's review also 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. Further, some of the rules from which Company seeks a variance are the demand-side management rules, which address energy efficiency issues outlined above in this paragraph.

4. The MDNR is uncertain of its position in this matter at this time.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

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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 _____ day of December, 2008.

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