

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

In the Matter of the Application of	)	
Kansas City Power & Light Company for	)	
Permission and Approval and a	)	
Certificate of Public Convenience and Necessity	)	
Authorizing it to Acquire, Construct, Install, Own,	)	
Operate, Maintain and Otherwise Control and	)	Case No. EA-2011-0368
Manage Electrical Production and Related	)	
Facilities in the Smart Grid Project Area Of	)	
Jackson County, Missouri	)	
	)	

**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 May 6, 2011, KCP&L Greater Missouri Operations Company ("KCP&L-GMO") filed an application for permission and approval and a certificate of public convenience and necessity to acquire, construct, install, own, operate, maintain, control and manage electrical production and related facilities in the Smart Grid Project Area of Jackson County, Missouri with the Missouri Public Service Commission. The Commission issued an *Order Establishing Intervention Date and Directing Staff To File Recommendation* ("Notice and Order") on May 11, 2011. In its May 11, 2011, Notice and Order, the Commission established an intervention deadline of May 23, 2011.

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 mandate set forth in Section 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.

4. MDNR has not determined the specific position it will take in this case; however, the Division of Energy supports more widespread development and use of Missouri's clean indigenous energy resources, including solar energy. More widespread use of these resources would provide both economic and environmental benefits. The use of solar energy as a renewable form of energy helps reduce emissions of pollutants by reducing consumption of fossil fuels. In addition, distributed generation fueled by renewable resources in KCP&L's SmartGrid Demonstration Area should be a visible demonstration of the technology. With expanded use, distributed generation also contributes to energy security benefits and less stress on the transmission and distribution systems associated with centrally generated electricity.

5. 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  
it be allowed to intervene in the above-styled matter.

Respectfully submitted,

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**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 23rd day of May 2011.

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