

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

In the Matter of KCP&L Greater Missouri            )  
Operations Company's Request for Authority        ) Case No. ER-2012-0175  
to Implement a General Rate Increase for         )  
Electric Service    )

**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 27, 2012, KCP&L Greater Missouri Operations Company (GMO) submitted a tariff designed to implement a general rate increase for electric service with the Missouri Public Service Commission. The Commission issued an *Order Suspending Tariff, Setting Pre-Hearing Conference, and Directing Filings; And Notice of Contested Case and Hearings* on February 28, 2012. In its February 28, 2012, Order, the Commission established an intervention deadline of March 19, 2012.

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

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5. MDNR is uncertain at this time of the position it will take regarding the relief sought by GMO in this case.

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 General

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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 9th day of March, 2012.

/s/ Jessica L. Blome  
Jessica L. Blome