

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

In the Matter of KCP&L Greater)	
Missouri Operations Company's Request)	File No. ET-2014-0028
For Variance from Portions of)	Tariff No. JE-2014-0059
4 CSR 240-20.065)	

**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, KCP&L Greater Missouri Operations Company ("GMO") filed a Request for Approval of Tariff and for Variance with Commission's Net Metering rules in 4 CSR 240-20.065 and also submitted modified tariffs. GMO'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 7, 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:

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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,

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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 20th day of August, 2013.

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