

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

In the Matter of KCP&L Greater)
Missouri Operations Company's) File No. ET-2014-0026
Solar Photovoltaic Rebate Program)

**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 July 5, 2013, KCP&L Greater Missouri Operations Company
("GMO") filed a Motion to Approve Tariff to Suspend Payment of Solar
Rebates and Motion for Expedited Treatment. GMO asks the Commission to
approve the tariff no later than September 3. GMO's July 5 filing
corresponds to the recent enactment of amendments to the Missouri
Renewable Energy Standard, § 393.1030 RSMo, et.seq, effective August 28,
2013.

2. On July 9, 2013, the Commission issued an *Order Directing
Filing* in File No. EO-2013-0505. No intervention deadline was set, but any
party wishing to respond was required to do so no later than July 30, 2013.
MDNR filed a response on July 30.

3. On August 1, 2013, the Commission issued an *Order Opening Case to Consider Tariff*. Parties in File No. EO-2013-0505 were not automatically made a party to the new case, ET-2014-0026.

4. On August 8, 2013, the Commission issued an *Order Suspending Tariff and Setting Prehearing Conference*.

5. MDNR, and specifically its Division of Energy, is a state agency vested with the powers and duties set forth in § 640.150 RSMo.

6. 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.

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

Jeremy D. Knee
Assistant Attorney General
P.O. Box 899
Jefferson City, Missouri 65102
Phone: 573-751-6579
Fax: 573-751-8796
Email: jeremy.knee@ago.mo.gov

With a copy to:

Mary Ann Young
Division of Energy
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102
Phone: 573-751-3335
Fax: 573-526-7553
Email: DNREnergyCases@dnr.mo.gov

8. 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,

CHRIS KOSTER
Attorney General

/s/ Jeremy D. Knee

JEREMY D. KNEE
Missouri Bar No. 64644
Assistant Attorney General
P.O. Box 899
Jefferson City, Missouri 65102
Phone: 573-751-6579
Fax: 573-751-8796
**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 16th day of August, 2013.

/s/ Jeremy D. Knee

Jeremy D. Knee
Assistant Attorney General