

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

In the Matter of the Application of KCP&L)	
Greater Missouri Operations Company for)	
Permission and Approval and a Certificate of)	
Public Convenience and Necessity Authorizing it to)	
Acquire, Construct, Install, Own, Operate, Maintain)	Case No. EA-2011-0165
And otherwise Control and Manage Electrical)	
Production and Related Facilities in Certain Areas)	
Of Buchanan County, Missouri Near the City of St.)	
Joseph)	

**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 7, 2010, KCP&L Greater Missouri Operations Company ("KCP&L-GMO") filed an application for a certificate of public convenience and necessity to acquire, construct, install, own, operate, maintain, control and manage electrical production and related facilities in or near St. Joseph, Missouri with the Missouri Public Service Commission. The Commission issued a *Notice of Application, Order Setting Deadline for Intervention and Order Directing Staff to File Recommendation* ("Notice and Order") on December 8, 2010. In its December 8, 2010, Notice and Order, the Commission established an intervention deadline of January 7, 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. The Division of Energy supports more widespread development and use of Missouri's clean indigenous energy resources, including landfill gas. More widespread use of these resources would provide both economic and environmental benefits. The use of landfill gas as a renewable form of energy helps reduce emissions of methane, a potent greenhouse gas and contributor to smog, and spares emissions of other pollutants by reducing consumption of fossil fuels. The methane not used to generate energy is either vented into the atmosphere or burned at landfills to minimize emissions. In 2004, the Division of Energy worked with the U.S. Environmental Protection Agency's Landfill Methane Outreach Program (LMOP) to assess the potential contribution of landfill gas to Missouri's energy mix.

(See <http://www.dnr.mo.gov/energy/renewables/landfillgas.htm>)

5. Communications, correspondence, orders and decision in this matter should be addressed 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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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all
counsel of record this 4th day of January, 2011.

/s/ Sarah Mangelsdorf
Sarah Mangelsdorf