

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light)
Company's 2018 Triennial Compliance Filing) File No. EO-2018-0268
Pursuant to 4 CSR 240-22)

APPLICATION TO INTERVENE OF NATIONAL ASSOCIATION
FOR THE ADVANCEMENT OF COLORED PEOPLE

The National Association for the Advancement of Colored People (NAACP), pursuant to 4 CSR 240-2.075, applies to intervene in this proceeding. In support of its application, the NAACP states:

1. The NAACP is a membership organization whose members include persons who reside throughout Missouri. NAACP members who reside in Missouri are also members of the Missouri State Conference of the NAACP. Many of the NAACP's Missouri members reside in Kansas City Power and Light Company's service territory and are Kansas City Power and Light Company ratepayers. The NAACP has multiple branch offices throughout Missouri, including an office at 111 East High St., Jefferson City, Missouri 65101.

2. Through its Environmental and Climate Justice Program, the NAACP works to address Environmental injustice, including the proliferation of climate change, which has a disproportionate impact on communities of color and low income communities in Missouri, the United States, and around the world. The NAACP is concerned with the build-up of greenhouse gases which lead to global warming, and with pollution from non-renewable sources which cause numerous health problems, and which tend to have a disproportionate impact on communities of color. The NAACP encourages energy efficiency measures and renewable energy sources, and opposes coal-fired energy generation.

3. The NAACP's interest in promoting coal plant retirements, energy efficiency, and clean, low-cost energy resources is different from that of the general public and may

be adversely affected by an order approving prolonged reliance on aging coal plants, inadequate levels of DSM programs and under-investment in renewable generation, particularly in low income communities and communities of color. The NAACP's intervention would serve the public interest in promoting the public health and in curtailing greenhouse gas emissions.

4. The NAACP is not yet certain of the position it will take in this case.
5. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, the NAACP respectfully requests that the Public Service Commission grant this application to intervene.

/s/ Bruce A. Morrison

Bruce A. Morrison (Mo. Bar No. 38359)
Great Rivers Environmental Law Center
319 N. Fourth Street, Suite 800
St. Louis, Missouri 63102
Tel. (314) 231-4181
Fax (314) 231-4184
bamorrison@greatriverslaw.org
Attorneys for National Association for the
Advancement of Colored People

CERTIFICATE OF SERVICE

I certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 24th day of April, 2018, to all counsel of record.

/s/ Bruce A. Morrison

Bruce A. Morrison