

**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)	File No. EA-2015-0256
Approval of a Certification of Public Convenience and)	
Authorizing it to Construct, Install, Own, Operate,)	
Maintain and Otherwise Control and Manage Solar)	
Generation Facilities in Western Missouri.)	

**APPLICATION TO INTERVENE
OF RENEW MISSOURI**

COMES NOW, Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”), pursuant to 4 CSR 240-2.075 and to facilitate access to highly confidential materials, and hereby submits this Application to Intervene in the above case. For its Application, Renew Missouri states:

1. On April 6, 2015, KCP&L Greater Missouri Operations Company (“GMO”) filed a Notice of Intended Case Filing, to which the Commission responded by opening this case. On November 12, 2015, GMO filed its Application for a Certification of Convenience and Necessity (“CCN”) to construct, own, operate and sell electricity from a solar generation facility in Jackson County near Greenwood, Missouri. On November 13, 2015, the Commission issued its Order which set the intervention deadline for December 7, 2015.

2. Earth Island Institute is a non-profit corporation organized under the laws of California with its principal place of business at 2150 Allston Way, Suite 460, Berkeley, CA 94704. Earth Island has a Certificate of Authority for a Foreign Nonprofit granted by the Missouri Secretary of State. Renew Missouri is a registered fictitious name of Earth Island Institute under § 417.200, RSMo, with its principal place of business at 910 E. Broadway, Suite 205, Columbia, MO 65201. Renew Missouri is a non-profit policy group whose mission is to transform Missouri into a leading state in renewable energy and energy efficiency by 2016.

3. As statewide advocates for renewable energy and compliance with Missouri's renewable energy laws, Renew Missouri's interests are different than those of the general public and may be adversely affected by a final order arising from this case.

4. Granting Renew Missouri intervention will serve the public interest by assisting the Commission's record for decision in this case, and no party will be adversely affected by such intervention.

5. Renew Missouri has not yet taken a position in this case.

6. Pleadings, notices and other correspondence in this case should be directed to:

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910 E. Broadway, Ste. 205
Columbia, MO 65201
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WHEREFORE, Renew Missouri respectfully requests that the Commission grant its Application to Intervene and make it a party to this case for all purposes, along with any further relief the Commission deems proper.

Respectfully Submitted,

/s/ Andrew J. Linhares
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ATTORNEY FOR RENEW MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was either mailed, faxed or emailed to all counsel of record on this 7th day of December, 2015.

/s/ Andrew J. Linhares

Andrew J. Linhares