

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

In the Matter of KCP&L Greater)
Missouri Operations Company's)
2013 Annual Renewable Energy) File No. EO-2013-0505
Standard (RES) Compliance Plan)

**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 April 15, 2013, KCP&L Greater Missouri Operations
Company ("GMO") filed its 2012 Annual Renewable Energy Standard
Compliance Report pursuant to Public Service Commission Rule 4 CSR 240-
20.100. The Commission opened Case No. EE-2013-0453 and on April 16,
2013, directed that notice be provided and that staff file a report of its review
no later than May 30, 2013. The Order also directed that no later than May
30, 2013, the Office of the Public Counsel, and any other interested person or
entity, may file comments regarding the report.

2. On May 10, 2013, the Department of Natural Resources ("DNR")
filed an application to intervene, which was granted by the Commission on
May 21, 2013. On May 28, 2013, KCP&L Greater Missouri Operations

Company (“GMO”) filed its 2013 Annual Renewable Energy Standard Compliance Plan and Report pursuant to Commission Rule 4 CSR 240-20.100. On the same date, it also filed a Revised 2012 Plan and Report (“Plans and Reports”).

3. The Commission closed File No. EE-2013-0453 and opened Case No. EO-2013-0505 to receive the Plans and Reports, set a deadline of July 12, 2013, for comments, but did not address the status of parties who had been granted intervention in Case No. EE-2013-0453.

4. MDNR, and specifically its Division of Energy, is a state agency vested with the powers and duties set forth in § 640.150 RSMo. In addition, MDNR is tasked with certifying renewable energy resources pursuant to § 393.1025(5) RSMo.

5. 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 report and plans from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. MDNR has a specific interest in encouraging renewable energy sources.

6. MDNR has not determined the specific position it will take in this case; however, the Division of Energy has an interest in participating in this matter.

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

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WHEREFORE, the MDNR respectfully requests that the Commission grant this Application to Intervene as soon as possible.

Respectfully submitted,

CHRIS KOSTER
Attorney General

/s/ Jessica L. Blome
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 27th day of June 2013.

/s/ Jessica L. Blome
Jessica L. Blome
Assistant Attorney General