

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the 2017 Integrated Resource	)	
Plan Annual Update for Kansas City Power &	)	<b>File No. EO-2017-0229</b>
Light Company	)	

In the Matter of the 2017 Integrated Resource	)	
Plan Annual Update for KCP&L Greater	)	<b>File No. EO-2017-0230</b>
Missouri Operations Company	)	

**APPLICATION TO INTERVENE OF SIERRA CLUB**

Comes now Sierra Club, and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, Sierra Club states the following.

1. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 800,000 members nationally and over 11,000 members in Missouri, many of whom reside in KCP&L's and GMO's service territories and are KCP&L or GMO ratepayers. The Missouri Chapter of Sierra Club has an office at 2818 Sutton Blvd, St. Louis, MO 63143; email [john.hickey@sierraclub.org](mailto:john.hickey@sierraclub.org); telephone 314-644-1011. Sierra Club exists for the purpose of preserving and protecting environmental values, and for years has been actively concerned with protecting air and water quality throughout the state of Missouri. Sierra Club's interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if KCP&L and GMO act to displace fossil-fuel generation through renewable energy, energy efficiency and demand response programs, and support widespread transportation electrification through programs designed to lower barriers to electric vehicle adoption. Sierra Club is concerned with the

build-up of greenhouse gases that lead to global warming, and with pollution from non-renewable sources that can result in a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, and respiratory, cardiovascular, and reproductive harms. To limit these climate and public health impacts, Sierra Club actively supports the increased use of renewable generating resources, increased energy efficiency, and the acceleration of transportation electrification, among other measures.

2. Sierra Club was a party to KCP&L's 2012 IRP, Case No. EO-2012-0323, and the 2013 and 2014 IRP updates (EO-2013-0537 and EO-2014-0256, respectively); KCP&L's 2015 IRP, Case No. EO-2015-0254; the MEEIA stipulation and agreement reached with KCP&L in Case No. EO-2012-0009; the KCP&L rate cases ER-2012-0174, ER-2014-0370, and ER-2016-0285, and the Commission's Working Case Regarding Electric Vehicle Charging Facilities, EW-2016-0123.

3. Sierra Club was also a party to the GMO triennial IRP case EO-2012-0324, the 2013 update EO-2013-0358 and 2014 update EO-2014-0257; the GMO triennial IRP case EO-2015-0252; the GMO MEEIA cases EO-2012-0009 and EO-2015-0241; and the GMO rate case ER-2016-0156

4. Sierra Club has a particular interest in transitioning the electric sector from coal-fired generation to cleaner and lower-cost forms of energy. These interests, and its interests in energy efficiency, renewable energy, and transportation electrification are different from those of the general public and could be adversely affected by an order approving prolonged reliance on aging coal plants, inadequate levels of DSM programs and continued discouragement of renewable generation. Moreover, Sierra Club's staff

and consultants have unique and extensive experience in analyzing the feasibility and cost-effectiveness of coal and its alternatives. Sierra Club's intervention would serve the public interest in prudent resource planning, public health, and the curtailment of greenhouse gases.

5. Sierra Club is not yet certain of the position it will take in this case.

6. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, Sierra Club respectfully requests the Public Service Commission to grant the application to intervene.

/s/ Henry B. Robertson  
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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 30th day of June, 2017, to all counsel of record.

/s/ Henry B. Robertson  
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