

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

In the Matter of KCP&L Greater Missouri Operations)
Company’s Filing for Approval of Demand-Side)
Programs and for Authority to Establish a)
Demand-Side Programs Investment Mechanism) File No. EO-2015-0241

**APPLICATION TO INTERVENE
OF RENEW MISSOURI**

COMES NOW, Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”), pursuant to rule 4 CSR 240-2.075 and the Commission’s August 31, 2015 *Order Directing Notice of Application, Establishing Intervention Filing Date, and Scheduling a Procedural Conference*, and applies to intervene in the above-styled case. For its Application, Renew Missouri states:

1. 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 not-for-profit clean energy policy and advocacy group whose mission is to transform Missouri into a leading state in renewable energy and energy efficiency by 2016.

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

Andrew J. Linhares
Staff Attorney, Renew Missouri
910 E. Broadway, Ste. 205
Columbia, MO 65201
(314) 471-9973
(314) 558-8450
andrew@renewmo.org

3. As advocates for the furtherance of best-practices energy efficiency policy in Missouri, 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, and reserves the right to take positions on specific issues as this case proceeds.

WHEREFORE, Renew Missouri respectfully requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully Submitted,

/s/ Andrew J. Linhares

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ATTORNEY FOR EARTH ISLAND
INSTITUTE d/b/a RENEW MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was mailed, faxed or emailed to all counsel of record on this 3rd day of September, 2015.

/s/ Andrew J. Linhares

Andrew J. Linhares