BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power &)	
Light Company's Request for)	Docket No. ER-2014-0370
Authority to Implement a General)	
Rate Increase for Electric Service)	

BRIGHTERGY LLC REPLY TO KANSAS CITY POWER & LIGHT COMPANY'S <u>RESPONSE IN OPPOSITION TO APPLICATION TO INTERVENE</u>

Brightergy, LLC ("Brightergy") hereby files its Reply to Kansas City Power & Light Company's (KCP&L) Response in Opposition to Application to Intervene. For its Reply, Brightergy states as follows:

1. Brightergy filed its Application to Intervene on November 3, 2014.

 KCP&L filed its Response in Opposition to Application to Intervene on November 12, 2014.

3. In its Response, KCP&L alleged several deficiencies with Brightergy's Application, including a failure to state "A) what interest Brightergy has in this case, how that interest differs from that of the general public and how that interest might be adversely affected by a final Commission order arising from this case, or B) how granting Brightergy intervention would serve the public interest."

4. Brightergy asserts that its original Application meets the required standards for the Commission to grant its intervention. However, in response to KCP&L's request for more information, Brightergy states the following:

5. Brightergy's interest in this case is that of an energy services company operating in KCP&L's service territory. Any change in rates could potentially affect Brightergy's business, and decisions made regarding renewable energy policies could likewise impact Brightergy's business planning. These factors set its interests apart from those of the general public.

6. No other company with Brightergy's expertise and outlook has petitioned to intervene in this matter. The public's interests will be served through Brightergy's unique business and policy perspectives which will inform the Commission's decision making process.

7. For these reasons, Brightergy respectfully requests that the Commission grant its timely Application for Intervention.

Respectfully submitted,

<u>/s/ Andrew Zellers</u> Andrew Zellers MO. Bar No. 57884 General Counsel and Vice President for Regulatory Affairs Brightergy, LLC 1617 Main Street, 3rd Floor, Kansas City, MO 64108 andy.zellers@brightergy.com office: <u>+1.816.866.0555</u> fax: +1.888.511.0822

Attorney for Brightergy, LLC

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically via the Electronic Filing and Information System (EFIS) on all counsel of record this 13th day of November, 2014.

/s/ Andrew Zellers

Andrew Zellers