

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

In the Matter of KCP&L Greater Missouri	)	
Operations Company's Submission of its 2015	)	File No. EO-2016-0281
Renewable Energy Standard Compliance Report	)	
	)	
In the Matter of KCP&L Greater Missouri	)	
Operations Company's Submission of its 2016	)	File No. EO-2016-0283
Renewable Energy Standard Compliance Plan	)	

**APPLICATION TO INTERVENE  
OF RENEW MISSOURI**

COMES NOW, Earth Island Institute d/b/a Renew Missouri ("Renew Missouri"), pursuant to Missouri Public Service Commission rule 4 CSR 240-2.075 and applies to intervene in the above-styled case. In support of 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  
910 E. Broadway, Ste. 205  
Columbia, MO 65201  
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3. On April 15, 2016, KCP&L-Greater Missouri Operations Company (“GMO”) submitted its 2015 RES Compliance Report and 2016-2018 RES Compliance Plan in compliance with 4 CSR 240-20.100. On April 19, 2016, the Commission issued an Order directing Staff to file a report and setting a deadline for the Office of Public Counsel and any other interested entity to file comments. Because outside parties have not received confidential work papers or access to highly confidential or proprietary information in this case, Renew Missouri is first submitting this Application to Intervene before filing comments.

4. Renew Missouri was instrumental in the passage of Proposition C in November, 2008, which gave rise to Missouri’s Renewable Energy Standard (“RES”) (§393.1025-1030, RSMo.). Renew Missouri has been involved at nearly every stage of rulemaking, utility compliance, and formal complaints concerning the RES before the Commission. As advocates for the furtherance of renewable energy investment and best-practices renewable energy 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.

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

WHEREFORE, Renew Missouri submits this Application to Intervene and respectfully requests that it be permitted to intervene, granted access to all work papers and highly confidential information, and be made a party to this case for all other purposes.

Respectfully Submitted,

/s/ Andrew J. Linhares  
Andrew J. Linhares, # 63973

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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 19<sup>th</sup> day of April 2016.

*/s/ Andrew J. Linhares*  
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Andrew J. Linhares