

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

In the Matter of KCP&L Greater Missouri Operations)
Company's Request for Authority to Implement a) File No. ER-2016-0156
General Rate Increase for Electric Service)

**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 March 3, 2016 *Notice of Hearing, Order Setting Conference Date, Directing Notice of Action, and Directing Filings*, and applies to intervene in the above-styled case. In support of its Application, Renew Missouri states:

1. On February 23, 2016, KCP&L Greater Missouri Operations Company ("GMO") filed its *Application and Minimum Filing Requirements and Tariff Revision* in this case, proposing a rate increase of 8.17% and \$59.3 million.

2. On March 2, 2016, the Commission issued its *Order Suspending Tariff, Notice of Contested Case, and Order Delegating Authority*; and on March 3, 2016, the Commission issued its *Notice of Hearing, Order Setting Conference Date, Directing Notice of Action, and Directing Filings*, which set an intervention deadline of March 17, 2016.

3. 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.

4. As advocates for the furtherance of renewable energy and energy efficiency investment, as well as best-practices clean 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. 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.

5. 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 (T)
(314) 558-8450 (F)
Andrew@renewmo.org

WHEREFORE, Renew Missouri submits this Application to Intervene and 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
Andrew J. Linhares, # 63973
910 East Broadway, Ste. 205
Columbia, MO 65201
T: (314) 471-9973
F: (314) 558-8450
Andrew@renewmo.org

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 11th day of March 2016.

/s/ Andrew J. Linhares
Andrew J. Linhares