

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

In the Matter of KCP&L Greater Missouri                    )  
Operations Company’s Submission of its 2014            )       File No. EO-2015-0264  
Renewable Energy Standard Compliance Report        )

In the Matter of KCP&L Greater Missouri                    )  
Operations Company’s Submission of its 2014            )       File No. EO-2015-0266  
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 4 CSR 240-2.075 and to facilitate access to highly confidential materials, and hereby submits this Application to Intervene in the above cases. For its Application, Renew Missouri states:

1. On April 15, 2015, KCP&L Greater Missouri Operations Company (“KCP&L-GMO”) filed a Motion for Extension of Time in order to be granted an additional week to submit its 2014 RES Compliance Report and its 2015-2017 RES Compliance Plan, pursuant to 4 CSR 240-20.100. On April 16, 2015, the Commission opened File No. EO-2015-0264 and EO-2015-0266 and granted KCP&L-GMO’s Motion for Extension of Time.

2. 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 non-profit policy group whose mission is to transform Missouri into a leading state in renewable energy and energy efficiency by 2016.

3. As statewide advocates for renewable energy and compliance with Missouri's renewable energy laws, Renew Missouri's interests are different than those of the general public and may be adversely affected by a final order arising from these cases.

4. Granting Renew Missouri intervention will serve the public interest by assisting the Commission's record for decision in these cases, and no party will be adversely affected by such intervention.

5. Renew Missouri has not yet taken a position in these cases.

6. Pleadings, notices and other correspondence in these cases 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](mailto:andrew@renewmo.org)

WHEREFORE, Renew Missouri respectfully requests that the Commission grant its Application to Intervene and make it a party to these cases for all purposes, along with any further relief the Commission deems proper.

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](mailto:Andrew@renewmo.org)

ATTORNEY FOR RENEW MISSOURI

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was either mailed, faxed or emailed to all counsel of record on this 22nd day of April, 2015.

*/s/ Andrew J. Linhares*

\_\_\_\_\_  
Andrew J. Linhares