

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

In the Matter of Kansas City Power & Light            )  
Company's Application for Authorization to            )        File No. ET-2016-0185  
Suspend Payment of Certain Solar Rebates            )

**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 January 19, 2015 *Notice and Order Setting Dates for Filings*, 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  
Staff Attorney, Renew Missouri  
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3. 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.

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's position in this case is reflected in the attached document *Response to KCP&L's Application for Authority to Suspend Payment of Solar Rebates*. Renew Missouri reserves the right to take further positions on specific issues as this case proceeds.

WHEREFORE, Renew Missouri submits this *Application to Intervene* and accompanying *Response*, 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*

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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 \_\_ day of January, 2016.

*/s/ Andrew J. Linhares*

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Andrew J. Linhares