BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Great Plains Energy Incorporated for Approval of its Acquisition of Westar Energy, Inc.

Docket No. EM-2018-0012

APPLICATION FOR INTERVENTION OF BRIGHTERGY, LLC

COMES NOW Brightergy, LLC ("Brightergy") and in support of its Application for Intervention states the following:

1. Brightergy is a limited liability company organized under the laws of the State of Missouri with its principal place of business at 1712 Main Street, 7th Floor, Kansas City, MO, 64108.

2. The Commission issued its <u>Order Directing Notice and Setting Intervention Date</u> <u>and Procedural Conference</u> in this docket on September 6, 2017, in which it set September 27, 2017 as the deadline for intervention in this docket.

3. Brightergy was granted intervention in earlier, related dockets, including EE-2017- 0113^{1} and the EM-2017-0026².

4. The issues raised by Great Plains Energy, Incorporated ("GPE" or the "Company") impact policies and procedures related to every aspect of energy regulation in the State of Missouri.

5. As a major provider of a variety of energy products and services in the Company's service territory, Brightergy has an interest in the Company's proposals in this docket different from that of the general public.

¹ <u>See</u> Order Granting Applications to Intervene, <u>In the Matter of the Joint Application of Great Plains Energy</u> <u>Incorporated, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company for a</u> <u>Variance from the Commission's Affiliate Transactions Rule, 4 CSR 240-20.015</u>, File No. EE-2017-0113.

² <u>See</u> Order Granting Motion to Consolidate, <u>In the Matter of Great Plains Energy Incorporated for Approval of its</u> <u>Acquisition of Westar Energy, Inc.</u>, File No. EM-2017-0226, which added all parties granted intervention in EE-2017-0013.

6. Brightergy's unique set of expertise will provide a perspective to the Commission's decision making that would otherwise be lacking, and it is therefore in the public's interest to allow Brightergy to intervene.

7. Correspondence, communications, orders and decisions in this case may be directed to Brightergy's undersigned legal counsel.

8. Brightergy does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.

WHEREFORE, Brightergy respectfully requests that the Commission grant is Application for Intervention in the above-styled case.

Respectfully submitted, <u>/s/ Andrew Zellers</u> Andrew Zellers MO. Bar No. 57884 General Counsel and Vice President for Regulatory Affairs Brightergy, LLC 1712 Main Street, 7th Floor, Kansas City, MO 64108 andy.zellers@brightergy.com office: +1.816.866.0555 fax: +1.888.511.0822

Attorney for Brightergy, LLC

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been served electronically this 8th day of September, 2017, to all parties on the Commission's service list in this case.

/s/ Andrew Zellers