

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

In the Matter of KCP&L Greater Missouri Operations Company's Application for Authorization to Suspend Payment of Certain Solar Rebates)) Case No. ET-2014-0059))

MOTION TO INTERVENE BY WIND ON THE WIRES

COMES NOW Wind on the Wires and hereby petitions the Public Service Commission of the State of Missouri ("PSC" or "Commission") for an order permitting Wind on the Wires to intervene in this proceeding under 4 CSR 240-2.075 as an interested entity. In support of its Motion to Intervene in this matter Wind on the Wires states and alleges as follows:

1. Wind on the Wires is a not-for-profit corporation organized and existing under the laws of the State of Minnesota. Wind on the Wires is a collaborative organization dedicated to wind energy's fair access to the electric transmission system and market throughout the Midwest. Our Board of Directors and members are comprised of wind developers, environmental organizations, wind energy experts, tribal representatives, clean energy advocates, and businesses providing goods and services to the wind industry in Missouri and across the country. Wind on the Wires is located at 570 Asbury St, Suite 201, St. Paul, MN 55104. Notice and mailings may be sent to Sean Brady, Regional Policy Manager, P.O. Box 4072, Wheaton, IL 60189-4072.

2. This motion is brought within 30 days after the Commission issued notice of this case.

3. Wind on the Wires will be directly and adversely affected by the decision of KCP&L Greater Missouri Operations to apportion spending for its renewable energy portfolio and suspend solar rebates on November 3, 2013. Wind on the Wires suggests the issues in this

case will affect how KCP&L Greater Missouri Operations meets its renewable energy standards and what form of energy it selects to meet the standards. If the entire 1% cap is met through solar rebates and not apportioned to other forms of renewable energy like wind, then that decision significantly works to the disadvantage of Wind on the Wires.

4. Wind on the Wires is unsure of the position it will take on the Application filed by KCP&L GMO.

5. No other party or entity interested in this proceeding can adequately represent the interests of Wind on the Wires because our interest differs from those of KCP&L and solar energy advocates; granting intervention will advance the interests of justice and will in no way impair the prompt consideration and resolution of this matter by the Commission.

6. Wind on the Wires' Intervention will serve the public interest by assisting the development of a full and complete record for the PSC's decision in this case.

Wherefore, Wind on the Wires seeks permission to intervene and provide additional information, which will serve the public interest.

/s/_Steven C. Reed_____
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CERTIFICATE OF SERVICE

The undersigned certifies that this Motion was electronically served upon all parties to this case on September 12, 2013

/s/Steven C. Reed