

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of)	
Kansas City Power & Light Company's)	File No. ER-2016-0285
Request for Authority to Implement)	
a General Rate Increase for Electric Service)	

APPLICATION TO INTERVENE OF SIERRA CLUB

Come now Sierra Club, and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, Sierra Club states the following.

1. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 600,000 members nationally and over 8,600 members in Missouri, many of whom reside in Kansas City Power & Light's ("KCP&L) Missouri service territory and are KCP&L ratepayers. The Missouri Chapter of Sierra Club has an office at 2818 Sutton Blvd, St. Louis, MO 63143; email john.hickey@sierraclub.org; telephone 314-644-1011. Sierra Club exists for the purpose of preserving and protecting environmental values, and for years has been actively concerned with protecting air and water quality throughout the state of Missouri. Sierra Club's interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if KCP&L acts to displace its fossil fuel generation through renewable energy, energy efficiency and demand response programs, and supports widespread transportation electrification through programs designed to lower barriers to electric vehicle adoption. Sierra Club is concerned with the build-up of greenhouse gases that lead to global warming, and with

pollution from non-renewable fossil fuel sources that can result in a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, and respiratory, cardiovascular, and reproductive harms. To limit these climate and public health impacts, Sierra Club actively supports the increased use of renewable generating resources, increased energy efficiency, and the acceleration of transportation electrification, among other measures.

2. Correspondence, communications, orders, and decisions may be sent to:

Henry B. Robertson (Mo. Bar No. 29502)
Great Rivers Environmental Law Center
319 N. Fourth Street, Suite 800
St. Louis, Missouri 63102
(314) 231-4181
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3. Sierra Club was a party to KCP&L's rate cases, ER-2012-0174 and ER-2014-0370; its IRP docket, EO-2012-0323, as well as its 2013 and 2014 updates; its MEEIA case, EO-2014-0095; and the Commission's Working Case Regarding Electric Vehicle Charging Facilities, EW-2016-0123.

4. Movant's interests focus on environmental protection and hence are different from those of the general public and could be adversely affected by an order approving environmental retrofits to aging coal-fired power plants, inadequate levels of DSM programs or an unreasonable demand-side investment mechanism, or continued utilization of excess coal-based generating capacity where more prudent and cost-effective alternatives exist, a circumstance that may result from the inefficient integration or management of added demand from transportation electrification. Sierra Club is

interested in rate design and cost recovery issues and in ensuring that KCP&L's tariffs and programs advance its customers' and Sierra Club's interests in renewable energy, efficient management of new load, and utility-facilitated transportation electrification.

5. Movant is not yet certain of the position it will take in this case.

6. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, Sierra Club respectfully requests the Public Service Commission to grant the application to intervene.

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Attorney for applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 25th day of July, 2016, to all counsel of record:

/s/ Henry B. Robertson
Henry B. Robertson