

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

In the Matter of KCP&L Greater Missouri)	
Operations Company's Demand Side)	<u>File No. ER-2019-0166</u>
Investment Mechanism Rider Rate)	Tracking No. JE-2019-0109
Adjustment and True-Up Required by)	
4 CSR 240-3.163(8))	

MISSOURI DIVISION OF ENERGY
APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Economic Development – Division of Energy (“DE”) and, pursuant to Missouri Public Service Commission (“Commission”) Rule 4 CSR 240-2.075, respectfully requests that the Commission grant intervention to DE in the above-styled matter. For its Motion to Intervene, DE states as follows:

1. On November 30, 2018, KCP&L Greater Missouri Operations Company (“GMO”) filed a tariff, with supporting testimony, to adjust charges related to its approved Demand Side Investment Mechanism Rider.

2. On December 3, 2018, the Commission issued an *Order Directing Notice, Establishing Intervention Date, and Directing Filing of Staff Recommendation* which established an intervention deadline of no later than December 17, 2018.

3. DE is a state agency vested with the powers and duties set forth in § 620.035 RSMo. DE’s interests are different than those of the general public, as illustrated by its statutory authority to: (1) plan for future energy needs and energy resource development; (2) monitor and analyze all federal, state, local and voluntarily disclosed private sector energy research projects and voluntarily disclosed private sector energy related data and information concerning supply and consumption; (3) develop, promote, administer and monitor energy conservation programs; (4) consult and cooperate with all state and federal

governmental agencies, departments, boards and commissions and all other interested agencies and institutions, governmental and nongovernmental, public and private, on matters of energy research and development, management, conservation and distribution; and (5) analyze the potential for increased use of diverse energy sources, energy efficient technologies, and other energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.

4. DE expects to develop its positions on specific issues as this case proceeds.

5. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned.

WHEREFORE, the Division of Energy respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

/s/ Michael Lanahan

Michael Lanahan, Bar # 67487

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**Attorney for Missouri Department of
Economic Development – Division of Energy**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 13th day of December, 2018.

/s/ Michael Lanahan

Michael Lanahan