

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

Kansas City Power & Light	)	File No. ER-2016-0285
Company's Request for Authority to	)	Tariff No. YE-2017-0004
Implement a General Rate Increase for	)	Tariff No. YE-2017-0005
Electric Service	)	

**APPLICATION TO INTERVENE OF  
THE UNITED STATES DEPARTMENT OF ENERGY  
AND THE FEDERAL EXECUTIVE AGENCIES**

The United States Department of Energy ("DOE" or "the Department") on behalf of themselves and all other affected Federal Executive Agencies ("FEA") and, in accordance with 4 C.S.R. 240-2.075 and the Missouri Public Service Commission's ("PSC" or "Commission") July 12, 2016 *Order Setting Conference Date, Directing Notice of Action, Establishing Intervention Date and Directing Filings*, files this application to intervene and be accorded full party status.

For this application, DOE respectfully states as follows:

1. The Department has been delegated the authority to represent all FEA located in Kansas City Power & Light Company's ("KCPL") service territory.
2. The Department operates at the Bannister Federal Complex ("Bannister"), an industrial facility located in Kansas City, Missouri. In recent years, some of the operations at Bannister have relocated, however it is estimated that in fiscal year 2017, the facility will consume electric power at a cost of approximately \$2.5 million. For this reason, Department interests are different from those of the general public and may be materially and substantially affected by the KCPL request that is the subject of the present proceeding. The interests of other FEA facilities within the KCPL service territory may also be materially and substantially affected by the KCPL request.
3. The Department has not yet ascertained the positions that it will take in this case.

4. The intervention of the Department on behalf of DOE and all other FEA will serve the public interest by assisting the Commission's record for decision in this case.

5. The undersigned DOE attorney, Rishi Garg, is not admitted to practice before the courts of the State of Missouri, and is admitted to practice before the courts in the State of Illinois and the District of Columbia. Mr. Garg has been in active practice of the law since 2003. Mr. Garg is not under suspension or disbarment by any of the courts of the state in which he is admitted to practice. Mr. Garg will in the future petition for leave to appear *pro hac vice* herein. The Department respectfully requests that this application be granted, pending completion and approval of that petition.

6. The Department respectfully requests that it be allowed to participate via telephone in the scheduling conference set to take place on Wednesday, July 27<sup>th</sup> 2016, pursuant to the Commission's July 12, 2016 *Order Setting Conference Date, Directing Notice of Action, Establishing Intervention Date and Directing Filings*.

7. Correspondence, communications and all other materials regarding this application including all Commission notices, decisions and orders should be addressed to:

Rishi Garg  
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1000 Independence Ave., S.W., Rm. 6D-033  
Washington, D.C. 20585  
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WHEREFORE. The Department respectfully requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully submitted on this 25<sup>th</sup> day of July, 2016.

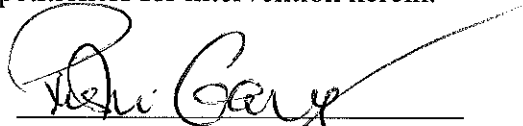


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#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 25<sup>th</sup> day of July, 2016, the foregoing pleading was:

- (1) formally placed on the Commission's website via the Commission's Electronic Filing and Information System ("EFIS") in accordance with applicable procedure; and
- (2) served via electronic mail on all of the entities and individuals, and all of the legal representatives of all of the entities and individuals, including Commission Staff, whom the EFIS at this date identifies as parties or petitioners for intervention herein.



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