

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

In the Matter of Kansas City Power & Light            )  
Company’s Request for Authority to Implement        )  
a General Rate Increase for Electric Service         )       File No. ER-2018-0145

In the Matter of KCP&L Greater Missouri            )  
Operations Company’s Request for Authority         )  
To Implement a General Rate Increase for            )  
Electric Service    )       File No. ER-2018-0146

**APPLICATION TO INTERVENE OUT-OF-TIME OF  
THE ADVANCED ENERGY MANAGEMENT ALLIANCE**

COMES NOW the Advanced Energy Management Alliance (“AEMA”) and, pursuant to 4 CSR 240-2.075 of the Missouri Public Service Commission’s (“Commission”) Rules of Practice and Procedure, respectfully requests the Commission grant AEMA intervention out-of-time in the above-styled matter. AEMA requests an intervention to respond specifically to the issues and topics identified in Staff’s April 23, 2018 Motion for Supplemental Direct Testimony in Furtherance of Staff’s Report on Distributed Energy Resources (“Motion”), Kansas City Power & Light’s (“KCP&L”) subsequent Supplemental Direct Testimony, and any future testimony directly related to Staff’s original Motion. For its Application to Intervene, AEMA respectfully states as follows:

1. On January 30, 2018, Kansas City Power & Light Company (“KCPL”) filed with the Commission tariffs that would implement a general rate increase for electric service.
2. On February 8, 2018, the Commission issued a Notice of Hearing, Order Directing Notice, Setting Conference Date, Establishing Intervention Dates, and

Direction Filings. In its Order, the Commission established an intervention deadline of February 20, 2018. At the time of the deadline, AEMA did not have a clearly defined interest in the case to warrant intervention. The subject matter in which AEMA is chiefly interested was not apparent in this case until recently. AEMA's application to intervene is therefore out of time.

3. AEMA is a nonprofit corporation organized under the laws of the District of Columbia. Additionally, it is a trade association under Section 501(c)(6) of the Federal tax code whose members include national distributed energy resource companies and advanced energy management service and technology providers, including demand response ("DR") providers, as well as some of the nation's largest demand response and distributed energy resources. AEMA member companies have worked with utilities on DR programs across the Midwestern United States, the Midcontinent Independent System Operator ("MISO") region, and the entire country, and have extensive experience working to align utility and ratepayer needs through proceedings before state regulatory Commissions.

4. On April 23, 2018, Staff filed a Motion for Supplemental Direct Testimony in Furtherance of Staff's Report on Distributed Energy Resources. This Staff Report was filed in File No. EW-2017-0245, which is a docket in which AEMA actively engaged, providing written comments and attending and presenting at conferences. As part of AEMA's comments and presentations, AEMA specifically advocated for utilities to adopt the "Indiana Model" as a means of achieving all cost-effective demand response. In the Staff Report, Staff recommended the Commission encourage the electric utilities to

submit tariffs similar to the Indiana Model, and in the Commission's Response to the Staff Report on April 18, 2018, the Commission accepted Staff's recommendations.

5. In Staff's April 23, 2018 Motion, Staff requested that the Commission direct KCP&L and KCP&L Greater Missouri Operations Company ("GMO") to respond to the recommendations from their Staff Report and submit exemplary tariffs, if applicable, related to the demand response and the Indiana Model. On May 4, 2018, the Commission granted that Motion and directed KCP&L and GMO to file supplemental direct testimony. On June 19, 2018, KCP&L filed supplemental direct testimony.

6. AEMA has interest in working with KCP&L and GMO to create and expand demand response and distributed energy resource opportunities, via the Indiana Model, as a means to achieving electricity cost savings for consumers, contributing to system reliability and resilience, and hedging against generation retirements and new capacity builds.

7. Given KCP&L's supplemental direct testimony on demand response and the Indiana Model, AEMA finds it important to provide its perspective on the topics requested in Staff's April 23, 2018 Motion.

8. AEMA's participation in this proceeding would serve the public interest and assist in the development of a complete public record. AEMA member companies are practitioners of the Indiana Model, in addition to many other DR programs and tariffs, and therefore have a unique perspective on the issues at hand. No other party to this proceeding is suited to represent AEMA's interests in an adequate fashion. Good cause exists for AEMA's intervention out of time.

9. At this time, AEMA has not adopted positions on specific issues in this case but reserves the right to do so as the case proceeds, to the extent that they relate to Staff's original Motion. AEMA accepts the record established in this case as of the date of this filing.

10. Correspondence and communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

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WHEREFORE, for the foregoing reasons, AEMA respectfully requests that the Commission grant its Application to Intervene Out-of-Time and thereby entitle AEMA to have notice and to appear at the taking of testimony, to produce and cross-examine witnesses and to be heard on the arguments, and in all other respects participate in the remainder of this proceeding.

Respectfully submitted,

/s/ Mark W. Comley  
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Attorneys for the Advanced Energy  
Management Alliance

**VERIFICATION**

STATE OF MISSOURI     )  
                                  ) ss.  
COUNTY OF COLE        )

I, Mark W. Comley, being first duly sworn, do hereby certify, depose and state that I am the attorney for the Advanced Energy Management Alliance, applicant for intervention in this proceeding; that I have read the above and foregoing Application to Intervene and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing application by the above said applicant.

/s/ Mark W. Comley

Subscribed and sworn to before me, a Notary Public, this 24<sup>th</sup> day of July, 2018.

/s/ Annette M. Borghardt  
Notary Public for Cole County, MO  
Commission # 14436657  
MCE 03-13-2022

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 24<sup>th</sup> day of July, 2018 to:

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**/s/ Mark W. Comley**

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