

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

Staff of the Missouri Public Service
Commission,)

Complainant,)

v.)

KCP&L Greater Missouri Operations
Company,)

Respondent,)

File No. EC-2016-0012

MISSOURI DIVISION OF ENERGY
APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Economic Development –
Division of Energy¹ (Division of Energy) and, pursuant to Commission Rule 4 CSR 240-
2.075, respectfully requests that the Commission issue its order granting the Division of
Energy’s Application to Intervene. For its Application, the Division of Energy states as
follows:

1. On July 13, 2015, the Staff of the Commission filed a complaint with the
Missouri Public Service Commission (“Commission”) against KCP&L Greater Missouri
Operations Company (“GMO”) as authorized by 4 CSR 240-2.070 and 4 CSR 240-
20.093 and Sections 386.020, 386.390, 386.570 and 393.1075 RSMo.

¹ The Division of Energy was transferred from the Department of Natural Resources (DNR) to the Department of Economic Development (DED) on August 29, 2013 by Executive Order 13-03. The Executive Order transfers “[A]ll authority, powers, duties, functions, records, personnel, property, contracts, budgets, matters pending, and other pertinent vestiges of the Division of Energy from the Missouri Department of Natural Resources to the Missouri Department of Economic Development...”

2. Staff's Complaint states in part "...GMO has failed and refused to provide the required avoided costs, being those used in GMO's obligations to administer its MEEIA programs for PY 2013 – PY 2015 are set forth by the Commission's aforesaid rules and are imposed by the Commission's Order Approving *Non-Unanimous Stipulation and Agreement Resolving KCP&L Greater Missouri Operations Company's MEEIA Filing* in Case No. EO-2012-0009." The Division of Energy is a Signatory to the Agreement and may be adversely affected by a final order arising from this case. Additionally, the public interest will be served by having an additional Signatory to the Agreement in this case.

3. On July 13, 2015, the Commission issued a Notice of Complaint, but no specific intervention deadline.

4. Commission Rule 4 CSR 240-2.075(1) states:

A motion to intervene or add new member(s) shall be filed within thirty (30) days after the commission issues its order giving notice of the case, unless otherwise ordered by the commission.

5. The Division of Energy is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.

6. The Division of Energy has an interest different than that of the general public, and its intervention will serve a public interest in that the Division of Energy will be looking at the alleged violations of Commission rules and orders from a formal policy and planning perspective, and has been granted intervention in EO-2015-0252, GMO's Integrated Resource Plan filed April 1, 2015.

7. Communications, correspondence, orders and decisions in this matter should be addressed to the undersigned with a copy to DEDEnergyCases@ded.mo.gov.

8. The Division of Energy is uncertain at this time of the position it will take in this case.

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

Respectfully submitted,

/s/ Alexander Antal

Alexander Antal

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Attorney for Missouri Division of Energy

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 5th day of August, 2015.

/s/ Alexander Antal

Alexander Antal