

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

In The Matter of KCP&L Greater Missouri Operations)
Company's 2018 Triennial Compliance Filing) **File No. EO-2018-0269**
Pursuant to 4 CSR 240 – Chapter 22)

MISSOURI DIVISION OF ENERGY
APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Economic Development –
Division of Energy¹ (“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 April 2, 2018, Kansas City Power & Light Company (“KCPL”) filed
with the Commission its 2018 Integrated Resource Plan (“IRP”), as required by the
Commission’s Electric Utility Resource Planning rule, 4 CSR 240-22.
2. On April 4, 2018, the Commission issued an *Order Directing Notice and Setting
Date for Submission of Intervention Requests*. In its Order, the Commission established an
intervention deadline of no later than April 25, 2018.
3. DE is a state agency vested with the powers and duties set forth in, *inter alia*,
§§ 640.150 and 640.676 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...”

4. DE's interests are different than those of the general public, as illustrated by its statutory authority to plan for future energy needs and energy resource development; develop, promote, administer and monitor energy conservation programs;² consult and cooperate with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; and analyze the potential for increased use of energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.³ DE's intervention, moreover, will serve a public interest, as DE will evaluate the filings from a formal state policy and planning perspective consistent with its interests in clean, affordable, abundant energy, and its efficient use.

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

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

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

² §§ 640.676 and 640.150.2 RSMo

³ § 640.150.1 RSMo.

Respectfully submitted,

/s/ Marc Poston

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**Attorney for Missouri Department of
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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 April, 2018.

/s/ Marc Poston

Marc Poston