

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

In The Matter of Kansas City Power & Light)
Company’s Application to Discontinue Certain) **File No. ET-2016-0268**
Demand-Side Management Programs) **Tariff No. JE-2016-0264**

In the Matter of KCP&L Greater Missouri Operations)
Company’s Application to Discontinue Certain) **File No. ET-2016-0269**
Demand-Side Management Programs) **Tariff No. JE-2016-0265**

**MISSOURI DIVISION OF ENERGY’S
MOTION TO INTERVENE**

COMES NOW the Missouri Department of Economic Development –
Division of Energy¹ (“DE”) and, pursuant to Commission Rule 4 CSR 240-2.075,
respectfully requests that the Missouri Public Service Commission (“Commission”) grant
intervention to DE in the above-styled matter. For its Motion to Intervene, DE states as
follows:

1. On April 11, 2016, Kansas City Power & Light Company (“KCP&L”) and
KCP&L Greater Missouri Operations Company (“GMO”) filed with the Commission
applications for approval to discontinue the MEEIA Cycle 2 Home Appliance Recycling
Rebate Program. KCP&L and GMO also filed revised tariffs to implement
discontinuance of the program with an effective date of May 11, 2016.

¹ On August 28, 2013, Executive Order 13-03 transferred “all 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. On April 12, 2016, the Commission issued its *Notice of Tariff Filing and Order Establishing Time to File Recommendations* which set an intervention deadline no later than April 18, 2016.

3. DE is a state agency vested with the powers and duties set forth in, *inter alia*, §§ 640.150 and 640.676 RSMo.

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 Missouri Department of Economic Development – Division of Energy respectfully requests that it be allowed to intervene in this case.

² §§ 640.676 and 640.150.2 RSMo.

³ § 640.150.1 RSMo.

Respectfully submitted,

/s/ Alexander Antal

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 14th day of April, 2016.

/s/ Alexander Antal

Alexander Antal