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

In the Matter of Kansas City Power & Light	)	
Company's 2018 Triennial Compliance Filing	)	File No. EO-2018-0268
Pursuant to 4 CSR 240-22.	)	

## APPLICATION TO INTERVENE 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 ("Commission") Rules of Practice and Procedure, respectfully requests the Commission grant AEMA intervention in the above-styled matter. For its Application to Intervene, AEMA respectfully 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. AEMA 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 MISO region, and the entire country, and have extensive experience working to align

utility and ratepayer needs through resource planning processes.

4. AEMA has interest in working with parties throughout Missouri to create and

expand demand response and distributed energy resource opportunities, 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. AEMA's participation in this

proceeding would therefore serve the public interest and assist in the development of a complete

public record. No other party to this proceeding is suited to adequately represent AEMA's

interests.

5 AEMA has not taken any positions on specific issues in this IRP but reserves the

right to do so as the case proceeds.

6. Correspondence and communications regarding this application, including

service of all notices and orders of this Commission, should be addressed to:

Katherine Hamilton

**Executive Director** 

Advanced Energy Management Alliance

1200 18th Street, NW, Suite 700

Washington, DC 20036

WHEREFORE, AEMA respectfully requests to be allowed to intervene in this

proceeding.

Respectfully submitted,

Katherine Hamilton

Executive Director

Advanced Energy Management Alliance

yeather olamolon

1200 18th Street, NW, Suite 700

Washington, DC 20036

Katherine@aem-alliance.org

202-524-8832

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served the foregoing pleading by e-mail, facsimile, or by depositing a copy of same in the U.S. Mail, postage prepaid and properly addressed to all parties of record, on this 23rd day of April, 2018.

Katherine Hamilton, Executive Director

yearhuin Ham Clon

Advanced Energy Management Alliance