

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

In the Matter of KCP&L Greater Missouri)	
Operations Company's Filing for Approval of)	Docket No. EO-2015-0241
Demand-Side Programs and for Authority to)	
Establish a Demand-Side Program Investment)	
Mechanism)	

COMES NOW Brightergy, LLC ("Brightergy") and in support of its Application for Intervention states the following:

1. Brightergy is a limited liability company organized under the laws of the State of Missouri with its principal place of business at 1712 Main Street, 6th Floor, Kansas City, MO, 64108.
2. The issues KCP&L-GMO raises in this docket impact primary areas of business for Brightergy, which include providing a variety of energy services, including energy efficiency solutions for private companies, school districts and municipalities among many other clients.
3. Brightergy operates in KCP&L-GMO's service territory, and has a direct financial interest in the goals set out in the Application to Approve DSIM Filing. Thus, Brightergy has an interest in the proceedings different from that of the general public, and could be adversely impacted by a decision in this matter.
4. Brightergy's unique set of expertise in the efficiency market will provide a perspective to the Commission's decision making that would otherwise be lacking, and it is therefore in the public's interest to allow Brightergy to intervene. No other party which has thus far petitioned to intervene in this docket possesses Brightergy's expertise, and thus no other party will be able to provide Brightergy's insight into the issues in this docket.
5. Correspondence, communications, orders and decisions in this case may be directed to Brightergy's undersigned legal counsel.
6. Brightergy does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.

WHEREFORE, Brightergy respectfully requests that the Commission grant its Application for Intervention in the above-styled case.

Respectfully submitted,

/s/ Andrew Zellers

Andrew Zellers MO. Bar No. 57884

General Counsel and Vice President for Regulatory Affairs

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Attorney for Brightergy, LLC

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been served electronically this 14th day of September, 2015, to all parties on the Commission's service list in this case.

/s/ Andrew Zellers