BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light)	
Company's Application for Approval of Demand-)	Case No. EO-2014-0095
Side Programs and for Authority to Establish a)	
Demand-Side Management Investment Mechanism)	

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 2402.075, 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 January 7, 2014, Kansas City Power & Light Company (KCP&L) filed an Application for Approval of Demand-Side Programs and for Authority to Establish a Demand-Side Management Investment Mechanism with the Missouri Public Service Commission (Commission). On January 8, 2014, the Commission issued an **Order Directing Notice of Application, Establishing Intervention Filing Date, and Scheduling a Procedural Conference**. In its January 8, 2014 Order, the Commission established an intervention deadline of no later than January 21, 2014, and scheduled a prehearing conference on January 30, 2014.

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. The Division of Energy is a state agency vested with the powers and duties set

forth in Section 640.150, RSMo.

3. 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 proposed filing from a formal policy and planning perspective. The Division of

Energy's review also will be in relation to the requirements set forth in rules 4 CSR 240-

3.163-4, which lists the information that an electric utility must provide when it seeks to

establish a Demand-Side Programs Investment Mechanism (DSIM) and to seek approval,

modification or discontinuance of demand-side programs. The Division of Energy has a

strong interest in encouraging energy efficiency through cost-effective demand-side

programs and this interest can be significantly furthered through DSIM filings made under

these rules.

4. Communications, correspondence, orders and decision in this matter should be

addressed to:

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with a copy to:

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5. 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,

CHRIS KOSTER

Attorney General

1s/ Cimothy A. Slackwell

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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 17th day of January, 2014.

/s/ Cimothy A. Slackwell
Timothy A. Blackwell