

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

In the Matter of the Joint Application of)
Great Plains Energy Incorporated, Kansas)
City Power & Light Company, and KCP&L) Case No. EE-2017-0113
Greater Missouri Operations Company for)
a Variance from the Commission’s Affiliate)
Transaction Rule, 4 CSR 240-20.015)

**OPPOSITION OF JOINT APPLICANTS TO
RENEW MISSOURI’S APPLICATION TO INTERVENE**

Great Plains Energy Incorporated (“GPE”), Kansas City Power & Light Company (“KCP&L”), and KCP&L Greater Missouri Operations Company (“GMO”) (collectively, “Joint Applicants”) state the following in opposition to the Application to Intervene of Earth Island Institute, d/b/a Renew Missouri (“Renew Missouri”):

1. Renew Missouri’s Application to Intervene fails to set forth facts required by Rule 4 CSR 240-2.075 (“Intervention Rule”) that would allow the Commission to grant its request.

2. Renew Missouri has failed to state facts demonstrating that it “has an interest which is different from that of the general public and which may be adversely affected by a final order” in this proceeding. Such facts are required by Subsection (3)(A) of the Intervention Rule. Renew Missouri’s unverified application presents no facts indicating what specific interest Renew Missouri may have in this particular proceeding which is different from that of the general public.

3. The Joint Applicants recognize that Renew Missouri is a “clean energy policy and advocacy group” that “advocates for the furtherance of renewable energy and energy efficiency investment.” See Application to Intervene of Renew Missouri, ¶¶ 4-5. However, the Application filed by the Joint Applicants in this matter does not seek to modify any of the commitments that KCP&L and GMO have made regarding these issues, or to change any of the rates, terms or

conditions of service under which they operate. Consequently, there is no basis for the Commission to conclude that Renew Missouri's interest is any different from that of the general public.

4. Secondly, Renew Missouri has failed to demonstrate under Subsection (3)(A) of the Intervention Rule that it has any interest "which may be adversely affected by a final order arising from the case." However, the Stipulation and Agreement ("Stipulation") agreed to by the Joint Applicants and the Staff of the Commission ("Staff") proposes to resolve issues raised by the Joint Application which seeks a limited variance from the Commission's Affiliate Transactions Rule. Given that nothing proposed in the request of the Joint Applicants or in the Stipulation agreed to by the Joint Applicants and Staff would cause a change to any rate, tariff or charge of KCP&L or GMO, or modify any of their environmental commitments, Renew Missouri's interests will not be adversely affected by a final order in this matter.

5. Furthermore, Renew Missouri's arguments regarding its desire "to provide input on major transactions affecting utilities under the jurisdiction" of the Commission, and its claim that "approval of the Stipulation and Agreement would effectively amount to approval of the merger" between GPE and Westar, are misplaced. See Application to Intervene of Renew Missouri, ¶ 5. This proceeding relates to the Commission's Affiliate Transactions Rule, 4 CSR 240-20.015, not to the approval of a merger or acquisition. The Stipulation does not change the current structure of GPE's ownership of KCP&L and GMO, or any of the rates or tariffs of those Missouri public utilities.

6. Finally, Subsection (3)(B) of the Intervention Rule states that intervention may also be granted by the Commission if it "would serve the public interest." Renew Missouri presents no facts showing why its intervention would serve the public interest. Because Staff

and the Office of the Public Counsel will be full participants in this proceeding, there is no reason for the Commission to grant Renew Missouri intervention in this proceeding.

7. To the extent that Renew Missouri wishes to continue its involvement in renewable energy and energy efficiency policy issues, those matters, as well as other issues related to the rates charged to customers and the tariffs under which they take service will be decided in future general rate cases filed by KCP&L and GMO in which Renew Missouri would have an opportunity to intervene.

WHEREFORE, the Joint Applicants request that the Commission deny the Application to Intervene of Renew Missouri as it has failed to make the proper showing under 4 CSR 240-2.075(3).

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CERTIFICATE OF SERVICE (PARTIES)

A copy of the foregoing was served upon the below named parties by email or U.S. mail, postage prepaid, this 28th day of October, 2016.

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**CERTIFICATE OF SERVICE
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A copy of the foregoing was served upon the below named parties by email or U.S. mail, postage prepaid, this 28th day of October, 2016.

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