

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

APPLICATION TO INTERVENE OF SIERRA CLUB

Come now Sierra Club, and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, Sierra Club states the following:

1. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 600,000 members nationally and over 8,600 members in Missouri, many of whom are KCP&L and KCP&L Greater Missouri Operations ("GMO") ratepayers. The Missouri Chapter of Sierra Club has an office at 2818 Sutton Blvd, St. Louis, MO 63143; email john.hickey@sierraclub.org; telephone 314-644-1011. Sierra Club exists for the purpose of preserving and protecting environmental values, and for years has been actively concerned with protecting air and water quality and a stable climate throughout the state of Missouri. Since 2004, Sierra Club has participated in numerous dockets before the Commission concerning KCP&L and GMO's operations, ranging from rate cases to integrated resource planning proceedings to energy efficiency dockets.

2. The issues in this case are framed by the application of the Joint Applicants for a variance, and the Stipulation and Agreement ("Stipulation") reached between the Joint Applicants and Commission Staff. The ramifications of the Stipulation are unknown

at this time, but the text of the Stipulation envisions events such as a credit downgrade, potentially leading to increased costs and/or a decline of service, and possible increases in cost of capital. While the signatories seek to prevent such outcomes, these events could adversely affect the Joint Applicants' investments in efficiency and renewable energy. The Stipulation (pp. 11–12) includes a list of “fundamental principles,” which include the following: (a) Generation, transmission and distribution and fleet integration decisions will be premised and implemented to position operations to deliver value over the long-term” and (b) “Continue to promote energy efficiency and environmental stewardship.” Sierra Club is interested in the content of these principles and whether they will be impeded or advanced by the terms of any future affiliate transactions as a result of this case.

3. Correspondence, communications, orders, and decisions may be sent to:

Henry B. Robertson (Mo. Bar No. 29502)
Great Rivers Environmental Law Center
319 N. Fourth Street, Suite 800
St. Louis, Missouri 63102
(314) 231-4181
(314) 231-4184 (facsimile)
hrobertson@greatriverslaw.org

4. Movant is not yet certain of the position it will take in this case.
5. Sierra Club's interests in environmental protection are distinct from those of the public at large and may be adversely affected by transactions between KCP&L, GMO, and Westar as affiliates of Great Plains Energy depending on the outcome of this case.

6. It will serve the public interest for the PSC to grant this application to

intervene.

WHEREFORE, Sierra Club respectfully requests the Public Service Commission to grant the application to intervene.

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Attorney for applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 26th day of October, 2016, to all counsel of record:

/s/ Henry B. Robertson
Henry B. Robertson