

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Compliance of KCP&L Greater )  
Missouri Operations Company with Certain ) File No. EO-2019-0045  
Requirements Related to SB 564 and Related Matters )

In the Matter of the Compliance of Kansas City )  
Power & Light Company with Certain Requirements ) File No. EO-2019-0047  
Related to SB 564 and Related Matters )

**MOTION TO INTERVENE OF NRDC**

Comes now the Natural Resources Defense Council (“NRDC”), and pursuant to 4 CSR 240-2.075, applies to intervene in the two cases captioned above. In support of its motion to intervene, NRDC states the following.

1. The Commission has not set an intervention deadline for this case. KCP&L and KCP&L-GMO filed their SB 564 PISA (Plant In Service Accounting) elections on Dec. 31, 2018 (effective Jan. 1, 2019) and their five-year capital plans on February 28, 2019, much of them being designated confidential.

2. NRDC is a nonprofit corporation organized under the laws of New York with a Midwest office at 20 North Wacker Drive, Suite 1600, Chicago, IL 60606; contact Ashok Gupta at that address or at 212-243-4351. It has over 4,800 members in Missouri. NRDC has been active in PSC dockets concerning the Missouri Energy Efficiency Investment Act, electric utility rate cases and IRPs, rulemakings, “green tariffs” and wind farm CCNs and working dockets on renewable energy, efficiency, electric vehicles and regulatory policy.

3. NRDC's interests include energy efficiency programs, renewable energy as the smart and economical replacement for fossil-fueled generation, "smart" energy upgrades and distribution planning, which NRDC has advocated in multiple dockets. Knowledge of KCP&L and GMO's plans will inform and give direction to NRDC's work on numerous dockets going forward. Familiarity with the plan requires access to the confidential portions. Therefore NRDC seeks to intervene, as the Commission allowed it and MIEC to do in the parallel Ameren File No. 2019-0044, in what is basically a repository file. As the Commission noted in its Feb. 26 order granting interventions in the Ameren case, "granting party status to the proposed intervenors is the best way to control disclosure of the confidential information filed by Ameren Missouri."

4. NRDC's interests are different from those of the general public in their environmental emphasis. NRDC seeks to transition from fossil-fueled electricity to energy efficiency and renewable energy in order to reduce pollution and ameliorate the adverse effects of fossil energy on the climate.

5. 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](mailto:hrobertson@greatriverslaw.org)

6. NRDC is not yet certain of the position it will take in this case.

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

intervene.

WHEREFORE, NRDC respectfully requests the Public Service Commission to grant this application to intervene.

/s/ Henry B. Robertson  
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Great Rivers Environmental Law Center  
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Attorney for NRDC

#### **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 12th day of March, 2019, to all counsel of record.

/s/ Henry B. Robertson  
Henry B. Robertson