## 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-	)	
Side Programs and for Authority to Establish A	)	File No. EO-2014-0095
Demand-Side Programs Investment Mechanism	)	

## MOTION TO INTERVENE OF NRDC

Comes now the Natural Resources Defense Council ("NRDC"), and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, NRDC states the following.

- 1. NRDC has a continuing interest in the success of demand-side programs in Missouri. NRDC participated in the MEEIA rulemaking. It was also a party to the stipulations and agreements reached with Ameren Missouri in Case No. EO-2012-0142 and with KCPL-GMO in Case No. EO-2012-0009, and was an intervenor in EO-2012-0008, the case for the KCPL MEEIA Plan that was later withdrawn.
- 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 David Weiskopf at that address, by email at dweiskopf@nrdc.org, telephone 312-651-7934, fax 312-234-9633. NRDC has over 6,000 members in Missouri as of this date, many of whom are KCPL ratepayers. NRDC and its members are interested in promoting energy efficiency, peak demand reduction and renewable energy resources to meet Missouri's energy needs. NRDC seeks to intervene in this proceeding in order that its

members and others may benefit from well designed and cost-effective energy efficiency programs. NRDC will bring significant expertise to this proceeding. The Staff of NRDC has extensive history with the design and implementation of utility programs and policies designed to deploy energy efficiency and peak demand reduction to benefit the public. NRDC has intervened and/or provided testimony on these issues in public utility commission proceedings in many states, including Missouri, Illinois, Ohio, Wisconsin, New York, Oregon, Iowa, New Jersey and California. NRDC has regularly presented testimony before the US Congress and various state legislatures related to the electric utility industry's use of energy efficiency resources, rate design, utility planning and other topics relevant to this proceeding.

- 3. Movant's interests focus on environmental protection and hence are different from those of the general public and could be adversely affected by an order approving inadequate levels of DSM programs or an unreasonable demand-side investment mechanism.
  - 4. Movant is not yet certain of the position it will take in this case.
- 5. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, the Natural Resources Defense Council respectfully requests the Public Service Commission to grant the application to intervene.

/s/ Henry B. Robertson
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## **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 21st day of January, 2014, to all counsel of record:

/s/ Henry B. Robertson Henry B. Robertson