

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light            )  
Company's Notice of Intent to File an                )    File No. EO-2015-0240  
Application for Authority to Establish a Demand- )  
Side Programs Investment Mechanism                )

**APPLICATION TO INTERVENE OF SIERRA CLUB**

Comes now Sierra Club, and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its application 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 reside in KCP&L's service territory and are KCP&L ratepayers. The Missouri Chapter of Sierra Club has an office at 2818 Sutton Blvd, St. Louis, MO 63143; email [john.hickey@sierraclub.org](mailto:john.hickey@sierraclub.org); telephone 314-644-1011.

2. Sierra Club exists for the purpose of preserving and protecting environmental values. Consistent with this mission, Sierra Club has long advocated for investment in clean, low-cost energy resources, such as energy efficiency and other demand-side programs, throughout the state of Missouri and across the country. Sierra Club is interested in promoting energy efficiency and peak demand reduction programs, and has been actively encouraging the use of such energy resources. Sierra Club has jointly or individually intervened and/or provided testimony on these and similar issues in a multitude of similar proceedings in Missouri and a number of other states including Arkansas, California, Colorado, Kentucky, Louisiana, Minnesota, North Carolina, Ohio,

Oklahoma, Pennsylvania, Virginia, Washington, and West Virginia. Sierra Club has also regularly presented testimony before the U.S. Congress and various state legislatures on issues related to the electric utility industry, including energy efficiency.

3. Sierra Club has a continuing interest in the success of demand-side programs across Missouri, including in KCP&L's service territory. Sierra Club participated in the MEEIA rulemaking; in KCPL-GMO and KCPL's MEEIA dockets, EO-2012-0009 and EO-2014-0095, and the Stipulations and Agreements reached therein; as well as Ameren Missouri's MEEIA plans, EO-2012-0142 and the Stipulation and Agreement reached therein, and EO-2015-0055. The Club is a member of KCPL's and GMO's stakeholder advisory group for demand-side management.

4. Sierra Club's specific interests in promoting energy efficiency and other clean, low-cost energy resources are different from the overall interests of the general public and could be adversely affected by an order approving inadequate levels of DSM programs and energy savings. Moreover, Sierra Club has a wealth of knowledge and experience in the complex issues pertaining to demand-side programs and associated cost recovery mechanisms, which are the subjects of KCP&L's application in this case, and Sierra Club's intervention would serve the public interest by assisting the Commission in fully considering this matter.

5. Sierra Club is not yet certain of the position it will take in this case, and reserves the right to take positions on specific issues as this case proceeds.

6. It will serve the public interest in public health and the curtailment of greenhouse gases for the PSC to grant this application to intervene.

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

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

Attorney for Sierra Club

### **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 14th day of September, 2015, to all counsel of record.

/s/ Henry B. Robertson  
Henry B. Robertson