

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

In the Matter of Kansas City Power & Light Company's Application for Authority to Establish a Demand-Side Programs Investment Mechanism)	<u>File No. EO-2019-0132</u>
)	Tariff No. JE-2019-0104
)	Tariff No. YE-2019-0103
In the Matter of KCP&L Greater Missouri Operations Company's Application for Authority to Establish a Demand-Side Programs Investment Mechanism)	<u>File No. EO-2019-0133</u>
)	Tariff No. YE-2019-0102

MISSOURI DIVISION OF ENERGY
APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Economic Development – Division of Energy (“DE”) and, pursuant to Missouri Public Service Commission (“Commission”) Rule 4 CSR 240-2.075, respectfully requests that the Commission grant intervention to DE in the above-styled matter. For its Motion to Intervene, DE states as follows:

1. On November 29, 2018, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company (collectively, “the Companies”) applied to the Commission for approval of certain demand-side programs, a Technical Resource Manual, and a Demand-Side Investment Mechanism as contemplated by the Missouri Energy Efficiency Investment Act and the Commission’s implementing regulations.

2. On December 4, 2018, the Commission issued an *Order Directing Notice of Application and Order Setting Hearing* which established an intervention deadline of no later than December 19, 2018.

3. DE is a state agency vested with the powers and duties set forth in § 620.035 RSMo. DE’s interests are different than those of the general public, as illustrated by its statutory authority to: (1) plan for future energy needs and energy resource development;

(2) monitor and analyze all federal, state, local and voluntarily disclosed private sector energy research projects and voluntarily disclosed private sector energy related data and information concerning supply and consumption; (3) develop, promote, administer and monitor energy conservation programs; (4) consult and cooperate with all state and federal governmental agencies, departments, boards and commissions and all other interested agencies and institutions, governmental and nongovernmental, public and private, on matters of energy research and development, management, conservation and distribution; and (5) analyze the potential for increased use of diverse energy sources, energy efficient technologies, and other energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.

4. DE expects to develop its positions on specific issues as this case proceeds.

5. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned.

WHEREFORE, the Division of Energy respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

/s/ Michael Lanahan

Michael Lanahan, Bar # 67487

Acting General Counsel

Missouri Department of Economic Development

P.O. Box 1157

Jefferson City, MO 65102

573-522-3304

mlanahan.deenergycases@ded.mo.gov

**Attorney for Missouri Department of
Economic Development – Division of Energy**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 11th day of December, 2018.

/s/ Michael Lanahan

Michael Lanahan