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

In the Matter of Kansas City Power & Light ) Company's Submission of its 2013 Renewable ) Energy Standard Compliance Report )

File No. EO-2014-0289

## MISSOURI DIVISION OF ENERGY'S APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Economic Development -

Division of Energy<sup>1</sup> ("DE") and, pursuant to Commission Rule 4 CSR 240-2.075 and to facilitate access to confidential filings on EFIS, respectfully requests that the Commission issue its order granting DE's Application to Intervene. For its Application, DE states as follows:

1. On April 15, 2014, Kansas City Power & Light Company ("KCPL") filed its 2013 Annual Renewable Energy Standard Compliance Report, as required by 4 CSR 240-20.100. On the same date, KCPL also filed a Request for Waiver of Commission Rule 4 CSR 240-20.100(7)(A)1.I(V). The Commission opened Case No. EO-2014-0289 and on April 16, 2014 directed that notice be provided and that Staff file a report of its review no later than May 30, 2014. In the same order, the Commission also announced that any interested persons or entities may file comments on the Compliance Report no later than May 30, 2014.

<sup>&</sup>lt;sup>1</sup> Executive Order 13-03 transferred the Division of Energy from the Department of Natural Resources to the Department of Economic Development on August 29, 2013. The Executive Order transferred "all authority, powers, duties, functions, records, personnel, property, contracts, budgets, matters pending, and other pertinent vestiges of the Division of Energy from the Missouri Department of Natural Resources to the Missouri Department of Economic Development...."

 DE is a state agency vested with the powers and duties set forth in § 640.150 RSMo. In addition, § 393.1030.4 RSMo tasks DE with certifying renewable energy resources for purposes of compliance with Missouri's Renewable Energy Standard.

3. DE has an interest different than that of the general public, and its intervention will serve a public interest in that DE will look at the Compliance Report from a formal policy and planning perspective, with a specific interest in encouraging renewable energy sources.

4. DE is uncertain at this time of the specific position it will take in this case.

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

Jeremy D. Knee Associate General Counsel Missouri Department of Economic Development P.O. Box 1157 Jefferson City, Missouri 65102 Phone: 573-522-3304 Fax: 573-526-7700 jeremy.knee@ded.mo.gov

with a copy to:

Mary Ann Young Division of Energy Missouri Department of Economic Development P.O. Box 1766 Jefferson City, Missouri 65102 Phone: 573-751-3335 Fax: 573-526-7553 DEDEnergyCases@ded.mo.gov WHEREFORE, the Missouri Division of Energy respectfully requests that it be

allowed to intervene in the above-styled matter.

Respectfully submitted,

<u>/s/ Jeremy Knee</u> JEREMY D. KNEE Missouri Bar No. 64644 Associate General Counsel Missouri Department of Economic Development P.O. Box 1157 Jefferson City, Missouri 65102 Phone: 573-522-3304 Fax: 573-526-7700 Attorney for Missouri Division of Energy

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served electronically on all

counsel of record this 21<sup>st</sup> day of April, 2014.

<u>/s/ Jeremy Knee</u> Jeremy D. Knee