

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

In the Matter of the Joint Application from )  
Kansas City Power & Light Company and )  
KCP&L Greater Missouri Operations )  
Company for a Variance from Selected )  
Provisions of the Commission’s Rules )  
Regarding Net Metering )

File No. EE-2019-0056

**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 August 27, 2018, Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) filed a Joint Application with the Missouri Public Service Commission, requesting that the Commission grant it variances from certain requirements of the Commission’s net metering rule, 4 CSR 240-20.065. KCP&L and GMO ask the Commission to grant a variance to allow them to remove the “solar rebate application” information from their respective Net Metering Tariffs.

2. On August 28, 2018, the Commission issued an *Order Providing Notice, Establishing Intervention Deadline, and Directing Response* which established an intervention deadline of no later than September 17, 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 with a copy to [DEDEnergyCases@ded.mo.gov](mailto:DEDEnergyCases@ded.mo.gov).

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

Respectfully submitted,

/s/ Marc Poston

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**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 17<sup>th</sup> day of September, 2018.

*/s/ Marc Poston*

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Marc Poston