

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

In the Matter of the Resource Plan of)
Kansas City Power & Light Company) **File No. EO-2016-0232**

In the Matter of the Resource Plan of KCP&L)
Greater Missouri Operations Company) **File No. EO-2016-0233**

MISSOURI DIVISION OF ENERGY’S
MOTION TO INTERVENE

COMES NOW the Missouri Department of Economic Development –
Division of Energy¹ (“DE”) and, pursuant to Commission Rule 4 CSR 240-2.075,
respectfully requests that the Missouri Public Service Commission (“Commission”) grant
intervention to DE in the above-styled matter. For its Motion to Intervene, DE states as
follows:

1. On March 15, 2016, Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) filed their Integrated Resource Plans (“IRP”) with the Commission.

2. The Commission has not issued any orders regarding intervention in these matters; however, in order to facilitate access to confidential filings on EFIS and participation in the Companies' scheduled stakeholder meeting, DE respectfully requests

¹ On August 28, 2013, Executive Order 13-03 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 . . .”

that the Commission issue its order granting DE's Application to Intervene by Tuesday April 26, 2016.

3. DE is a state agency vested with the powers and duties set forth in, *inter alia*, §§ 640.150 and 640.676 RSMo.

4. DE's interests are different than those of the general public, as illustrated by its statutory authority to plan for future energy needs and energy resource development; develop, promote, administer and monitor energy conservation programs;² consult and cooperate with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; and analyze the potential for increased use of energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.³ DE's intervention, moreover, will serve a public interest, as DE will evaluate the filings from a formal state policy and planning perspective consistent with its interests in clean, affordable, abundant energy, and its efficient use.

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

6. Communications, correspondence, orders, and decision in this matter should be addressed to the undersigned with a copy to DEDEnergyCases@ded.mo.gov.

WHEREFORE, the Missouri Department of Economic Development – Division of Energy respectfully requests that it be allowed to intervene in this case.

² §§ 640.676 and 640.150.2 RSMo.

³ § 640.150.1 RSMo.

Respectfully submitted,

/s/ Alexander Antal

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 21st day of April, 2016.

/s/ Alexander Antal

Alexander Antal