

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

In the Matter of KCP&L Greater Missouri Operations)
Company's Submission of Its 2017 Renewable) **File No. EO-2018-0289**
Energy Standard Compliance Report)

In the Matter of KCP&L Greater Missouri Operations)
Company's Submission of Its 2018 Renewable) **File No. EO-2018-0291**
Energy Standard Compliance Plan)

**MISSOURI DIVISION OF ENERGY'S
APPLICATION 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 Commission issue its order granting DE’s Application to Intervene. For its
Application, DE states as follows:

1. On April 13, 2018, KCP&L Greater Missouri Operations (“GMO”) filed its *2017 Renewable Energy Standard Compliance Report* (“report”) and its *2018 Annual Renewable Energy Standard Compliance Plan* (“plan”), as required by 4 CSR 240-20.100.
2. On April 16, 2018, the Commission issued an *Order Directing Notice* (“Order”) which directed that Staff file a report of deficiencies no later than May 29, 2018 and any interested person may also file comments.

¹ 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....”

3. 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.

4. 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 and Plan from a formal policy and planning perspective, with a specific interest in encouraging renewable energy sources.

5. DE seeks to be granted intervention because DE does not have access to confidential documents filed in EFIS without being granted intervention.

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

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

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

Respectfully submitted,

/s/ Marc Poston

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**Attorney for Missouri Department of Economic
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served electronically on all counsel of record this 3rd day of May, 2018.

/s/ Marc Poston