

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

In the Matter of )  
the Resource Plan of ) File No. EO-2015-0252  
KCP&L Greater Missouri Operations Company )

In the Matter of )  
the Resource Plan of ) File No. EO-2015-0254  
Kansas City Power & Light Company )

**MISSOURI DIVISION OF ENERGY’S  
MOTION 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,  
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 April 1, 2015, KCP&L Greater Missouri Operations Company (EO-2015-0252) and Kansas City Power & Light Company (EO-2015-0254) filed their Integrated Resource Plans (IRP) with the Commission.
2. On April 3, 2015, the Commission issued an *Order Directing Notice and Setting Time to File Applications for Intervention*. In its April 3, 2015 Order, the Commission established an intervention deadline of April 20, 2015.

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<sup>1</sup> 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 . . . ”

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;<sup>2</sup> 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.<sup>3</sup> 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](mailto: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.

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<sup>2</sup> §§ 640.676 and 640.150.2 RSMo.

<sup>3</sup> § 640.150.1 RSMo.

Respectfully submitted,

/s/ Alexander Antal

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**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 13<sup>th</sup> day of April, 2015.

/s/ Alexander Antal

Alexander Antal