

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

In the Matter of KCP&L Greater Missouri Operations )  
Company’s Request for Authority to Implement a ) **File No. ER-2016-0156**  
General Rate Increase for Electric Service )

**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 February 23, 2016, KCP&L Greater Missouri Operations Company  
filed with the Commission a revised tariff to implement a rate increase.
2. On March 2, 2016, the Commission issued its *Order Suspending Tariff,  
Notice of Contested Case, and Order Delegating Authority*; and on March 3, 2016, the  
Commission issued its *Notice of Hearing, Order Setting Conference Date, Directing  
Notice of Action, and Directing Filings* which set an intervention deadline of March 17,  
2016.
3. DE is a state agency vested with the powers and duties set forth in, *inter  
alia*, §§ 640.150 and 640.676 RSMo.

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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 . . . ”

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.

Respectfully submitted,

/s/ Alexander Antal

Alexander Antal

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Missouri Bar No. 65487

Department of Economic Development

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

<sup>3</sup> § 640.150.1 RSMo.

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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 4<sup>th</sup> day of March, 2016.

*/s/ Alexander Antal*  
Alexander Antal