

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

In the Matter of KCP&L Greater Missouri Operations)
Company’s Filing for Approval of Demand-Side) **File No. EO-2015-0241**
Programs and for Authority to Establish a)
Demand-Side Programs Investment Mechanism)

MISSOURI DIVISION OF ENERGY
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, DE states the following:

1. On August 28, 2015, KCP&L Greater Missouri Operations Company (“GMO”) filed an Application for approval of Demand-Side Programs and for authority to establish a Demand-Side Investment Mechanism (DSIM) as contemplated by the Missouri Energy Efficiency Investment Act (MEEIA) and the Commission’s implementing regulations.
2. On August 31, 2015, the Commission issued an *Order Directing Notice of Application, Establishing Intervention Filing Date, and Scheduling a Procedural Conference* which set an intervention deadline of September 14, 2015.
3. DE is a state agency vested with the powers and duties set forth in, inter alia, §§ 640.150 and 640.676 RSMo.

¹ Executive Order 13-03 transferred the Division of Energy from the Department of Natural Resources (DNR) to the Department of Economic Development (DED) effective 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....”

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.

The DE's review also will be in relation to the requirements set forth in rules 4 CSR 240-3.163, which lists the information that an electric utility must provide when it seeks to establish a DSIM and to seek approval, modification or discontinuance of demand-side programs. The Division of Energy has a strong interest in encouraging energy efficiency through cost-effective demand-side programs and this interest can be significantly furthered through DSIM filings made under these rules.

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 counsel 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 8th day of September, 2015.

/s/ Alexander Antal

Alexander Antal