

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

**FILED<sup>2</sup>**  
JUL 25 2006  
Missouri Public  
Service Commission

In the Matter of Resource Plan of Kansas     )  
City Power & Light Company Pursuant     )  
to 4 CSR 240-22     )

Case No. EO-2007-0008

**MISSOURI DEPARTMENT OF NATURAL RESOURCES' MOTION TO  
INTERVENE**

The Missouri Department of Natural Resources (MDNR), pursuant to 4 CSR 240-2.075, respectfully requests that the Commission grant its application to intervene in the above-styled matter. This application is made for the following reasons:

1. On or about July 5, 2006, Kansas City Power & Light Company (Company) filed its Utility Resource Plan or Integrated Resource Plan as required by 4 CSR 240-2.
2. On or about July 18, 2006, the Commission issued an Order directing notice, setting a date for submission of intervention requests and scheduling a pre-hearing conference. The July 18, 2006, Order establishes August 7, 2006, as the date by which all applications to intervene in the above-styled case are to be filed.
3. MDNR, and specifically its Energy Center, is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.
4. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that the Energy Center will be looking at the proposed filing from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. The Energy Center's review also will be in

relation to the mandate set forth in Section 640.150, RSMo. The mandate set forth in the statute includes planning for energy resource development; analyzing energy management issues; consulting and cooperating with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; assessing the potential impacts on environmental quality; and analyzing the potential for increased use of energy alternatives and making recommendations for the expanded use of such alternate energy sources and technologies.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

JEREMIAH W. (JAY) NIXON  
Attorney General

A handwritten signature in cursive script, reading "Shelley A. Woods".

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## CERTIFICATE OF SERVICE

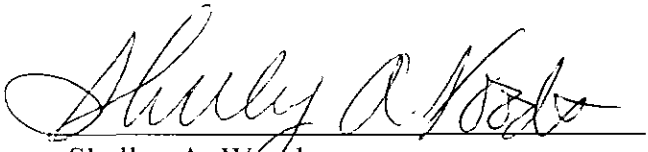
I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 25<sup>th</sup> day of July, 2006.

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