

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of	)	
the Resource Plan of	)	File No. EO-2018-0268
Kansas City Power & Light Company	)	

**APPLICATION TO INTERVENE OF SIERRA CLUB**

Comes now Sierra Club, and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, Sierra Club states the following.

1. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 800,000 members nationally and over 12,000 members in Missouri, many of whom reside in Ameren's service territory and are Ameren ratepayers. The Missouri Chapter of the Club has an office at 2818 Sutton Blvd, St. Louis, MO 63143; email [john.hickey@sierraclub.org](mailto:john.hickey@sierraclub.org); telephone 314-644-1011. Sierra Club exists for the purpose of preserving and protecting environmental values, and for years has been actively concerned with protecting air and water quality throughout the state of Missouri. Sierra Club's interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if Ameren acts to displace its fossil fuel generation through renewable energy, energy efficiency and demand response programs. Sierra Club is concerned with the build-up of greenhouse gases that lead to global warming, and with pollution from non-renewable fossil fuel sources that can result in a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, and respiratory, cardiovascular, and reproductive harms. To limit these climate

and public health impacts, Sierra Club actively supports the increased use of renewable generating resources and energy efficiency,

2. Sierra Club participated in the MEEIA rulemaking and subsequent MEEIA implementation dockets. It was a party to KCP&L's IRP cases EO-2012-0323 and EO-2015-0254, and the 2013 and 2014 IRP updates; the MEEIA stipulation and agreement reached with KCP&L in Case No. EO-2012-0009; and the KCP&L rate cases ER-2012-0174 and ER-2014-0370.

3. Sierra Club has a particular interest in promoting coal plant retirements and with the rising cost of environmental compliance for aging coal-fired plants. This, together with its interests in energy efficiency and clean, low-cost energy resources, is different from those of the general public and could be adversely affected by an order approving prolonged reliance on aging coal plants, inadequate levels of DSM programs and continued discouragement of renewable generation. Moreover, Sierra Club's staff and consultants have extensive experience in analyzing the feasibility and cost-effectiveness of coal and its alternatives. Sierra Club's intervention would serve the public interest in public health and the curtailment of greenhouse gases.

4. Sierra Club is not yet certain of the position it will take in this case.

5. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, Sierra Club respectfully requests the Public Service Commission to grant the application to intervene.

/s/ Henry B. Robertson  
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Attorney for Sierra Club

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 23d day of April, 2018, to all counsel of record.

/s/ Henry B. Robertson  
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