

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

In the Matter of Kansas City Power & Light)
Company’s Submission of its 2015 Renewable) **File No. EO-2016-0280**
Energy Standard Compliance Report)

In the Matter of KCP&L Greater Missouri)
Operations Company’s Submission of its 2015) **File No. EO-2016-0281**
Renewable Energy Standard Compliance Report)

In the Matter of Kansas City Power & Light)
Company’s Submission of its 2016 Renewable) **File No. EO-2016-0282**
Energy Standard Compliance Plan)

In the Matter of KCP&L Greater Missouri)
Operations Company’s Submission of its 2016) **File No. EO-2016-0283**
Renewable Energy Standard Compliance Plan)

**MISSOURI DIVISION OF ENERGY’S
APPLICATION TO INTERVENE**

COMES NOW the Missouri Department of Economic Development –
Division of Energy¹ (“DE”) and, pursuant to Commission Rule 4 CSR 240-2.075 and to
facilitate access to confidential filings on EFIS, respectfully requests that the Commission
issue its order granting DE’s Application to Intervene. For its Application, DE states as
follows:

¹ Executive Order 13-03 transferred the Division of Energy from the Department of Natural Resources to the Department of Economic Development on 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....”

1. On April 15, 2016, Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) filed their 2015 Renewable Energy Standard Compliance Reports and 2016 Compliance Plans, as required by 4 CSR 240-20.100(8).

2. On April 19, 2016 the Commission issued an *Order Directing Notice and Setting Filing Deadline (“Order”)* in the above cases directing Staff to file a report of its review no later than May 30, 2016. In the same *Order*, the Commission also set a deadline of no later than May 30, 2016 for the Office of Public Counsel and any other interested person to file comments on the Compliance Reports and Plans.

3. DE is a state agency vested with the powers and duties set forth in § 640.150 RSMo. In addition, § 393.1030.4 RSMo tasks DE with certifying renewable energy resources for purposes of compliance with Missouri’s Renewable Energy Standard.

4. DE has an interest different than that of the general public, and its intervention will serve a public interest in that DE will look at the Compliance Report and Plan from a formal policy and planning perspective, with a specific interest in encouraging renewable energy sources.

5. DE is uncertain at this time of the specific position it will take in this case.

6. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned with a copy to DEDEnergyCases@ded.mo.gov.

WHEREFORE, the Missouri Division of Energy respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

/s/ Alexander Antal

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 20th day of April, 2016.

/s/ Alexander Antal

Alexander Antal