

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

Application of Kansas City Power & Light)	
Company and KCP&L Greater Missouri)	Case No. EU-2010-0194
Operations Company for an Accounting)	
Authority Order)	

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

COMES NOW Missouri Department of Natural Resources (MDNR) and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully requests that the Commission issue its order granting MDNR's Application to Intervene. For its Application, MDNR states as follows:

1. On December 29, 2009, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company (Companies) applied for an Accounting Authority Order (AAO). By order dated January 6, 2010, the Commission established an intervention deadline of January 21, 2010.
2. MDNR, and specifically its Energy Center, is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.
3. 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 AAO 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 mandates set forth in Section 393.1040, RSMo directing consultation between the Commission and MDNR on renewable energy portfolio requirements, and in

Section 640.150, RSMo. for 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.

4. The MDNR concurs with the Companies' recommendation that their request for an Accounting Authority Order should be processed separately from the tariff also filed December 29, 2009. The MDNR further asserts that the tariff should be processed as soon as possible, given that according to Section 393.1030, RSMo, commonly referred to as Proposition C, the solar photovoltaic rebate program tariff was to be filed and in effect by January 1, 2010. The MDNR will provide its feedback on the contents of the tariff directly to the Commission Staff and the Companies in a timely manner and as directed by the Commission.

5. The MDNR has not yet determined its position on the Accounting Authority Order.

6. Copies of all pleadings, notices, orders and other communications should be sent to undersigned counsel. In addition, please add Mary Ann Young, Legal Counsel, Missouri Energy Center, Missouri Department of Natural Resources, to the service list in the matter. Ms. Young's contact information is: P.O. Box 176, Jefferson City MO 65102; phone: 573-526-7052; fax: 573-526-7553, email: maryann.young@dnr.mo.gov.

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

Respectfully submitted,

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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 _____ day of January 2010.

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