

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

In the Matter of the First Prudence Review of)
Kansas City Power & Light Company)
Implementation of Energy Efficiency Programs in) **File No. EO-2016-0183**
Furtherance of the Missouri Energy Efficiency)
Investment Act (MEEIA))

MISSOURI DIVISION OF ENERGY
APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Economic Development –
Division of Energy¹ (“DE”) and, pursuant to Missouri Public Service Commission
 (“Commission”) Rule 4 CSR 240-2.075, respectfully requests that the Commission grant
intervention to DE in the above-styled matter. For its Motion to Intervene, DE states as
follows:

1. On June 13, 2016 the Commission’s Staff filed its *Report of First MEEIA
Prudence Audit* of Kansas City Power & Light Company (“KCP&L”). Staff reviewed the
prudence of costs incurred by KCP&L as part of its demand-side programs and
investment mechanisms, originally approved by the Commission in File No. EO-2014-
0095. DE was a party to that case.

2. On June 14, 2016, the Commission issued an *Order Directing Notice, Setting
Deadlines for Filing Response or Requesting a Hearing*. In its Order, the Commission
established an intervention deadline of no later than June 23, 2016.

¹ The Division of Energy was transferred from the Department of Natural Resources (DNR) to the Department of Economic Development (DED) on August 29, 2013 by Executive Order 13-03. The Executive Order transfers “[A]ll 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...”

3. DE is a state agency vested with the powers and duties set forth in, *inter alia*, §§ 640.150 and 640.676 RSMo.

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.

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

6. The Division of Energy is uncertain at this time of the position it will take in this case.

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

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 22nd day of June, 2016.

/s/ Alexander Antal

Alexander Antal