

the responsible use of the earth's ecosystems and resources; to educating and enlisting humanity to protect and restore the quality of the natural and human environment; and to using all lawful means to carry out these objectives. Sierra Club has many years of experience working on energy and electric generation issues throughout the United States, including in Missouri. Since 2004, Sierra Club has participated in numerous dockets before the Commission concerning KCP&L and GMO's operations, ranging from rate cases to integrated resource planning proceedings to energy efficiency dockets.

4. Among other aspects, the Applicants argue that the merger will have a positive effect on the environment,¹ will have no detrimental effect on the public interest,² and will confer substantial benefits upon customers (fiscal and otherwise).³ Sierra Club, on behalf of its ratepayer members, is interested in reviewing these and other assertions.

5. Correspondence, communications, orders, and decisions may be sent to:

Henry B. Robertson (Mo. Bar No. 29502)
Great Rivers Environmental Law Center
319 N. Fourth Street, Suite 800
St. Louis, Missouri 63102
(314) 231-4181
(314) 231-4184 (facsimile)
hrobertson@greatriverslaw.org

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

7. Sierra Club's interests in low-cost, clean energy generation and environmental protection are distinct from those of the public at large and may be adversely affected by the merger. Sierra Club is uniquely situated to represent the interests of its members in this proceeding as a result of its expertise and experience in energy policy and law, and

¹ Application at ¶45.

² Application at ¶48.

³ Direct Testimony of Terry Bassham, p. 6, lines 1-2.

environmental regulations that affect the market for energy generation. Sierra Club has recently intervened to consider the economics and public interest of utility merger proposals in Hawaii, Kansas, Louisiana, Maryland, Nevada, and North Carolina. Thus, Sierra Club may provide the Commission with legal, technical, and economic information to help develop a record that will provide the Commission with evidence on issues that may not otherwise be analyzed.

8. 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.

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Attorney for applicant

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 27th day of September, 2017, to all counsel of record:

/s/ Henry B. Robertson
Henry B. Robertson