

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Great Plains)
Energy Incorporated for Approval of its Merger) Case No. EM-2018-0012
with Westar Energy, Inc.)

APPLICATION TO INTERVENE OF NRDC

Comes now the Natural Resources Defense Council (“NRDC”), and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, NRDC states the following.

1. On August 31, 2017, Great Plains Energy Incorporated, Kansas City Power & Light Company (“KCP&L”), KCP&L Greater Missouri Operations Company (“GMO”), and Westar Energy, Inc., filed a joint application asking the Commission to approve a merger between GPE and Westar, as well as a variance from the Commission’s Affiliate Transactions rule.

2. NRDC is a nonprofit corporation organized under the laws of New York with a Midwest office at 20 North Wacker Drive, Suite 1600, Chicago, IL 60606; contact Ashok Gupta at that address or at 212-243-4351. It has over 4,800 members in Missouri, many of whom are KCP&L and GMO ratepayers. NRDC and its members are interested in promoting energy efficiency, peak demand reduction and renewable energy resources to meet Missouri’s energy needs and to do so more cost-effectively than conventional fossil-fuel and nuclear generation. NRDC will bring significant expertise to this proceeding. The Staff of NRDC has extensive history with the design and implementation of utility programs and policies designed to deploy energy efficiency and

peak demand reduction to benefit the public, and the financing and other aspects of renewable energy generation as compared to fossil-fuel and nuclear generation. NRDC has intervened and/or provided testimony on these issues in public utility commission proceedings in many states, including Missouri, Illinois, Michigan, Ohio, Wisconsin, New York, Oregon, Iowa, New Jersey and California. NRDC has regularly presented testimony before the US Congress and various state legislatures related to the electric utility industry's use of energy efficiency and renewable resources, utility planning and other topics relevant to this proceeding.

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

Henry B. Robertson (Mo. Bar No. 29502)
Great Rivers Environmental Law Center
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(314) 231-4181
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4. NRDC'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. NRDC 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 environmental regulations that affect the market for energy generation. Thus, NRDC may provide the Commission with legal, technical, and economic information to help develop a record that will provide the Commission with evidence relevant to the functioning of a combined company.

5. Movant's interests are different from those of the general public and could

be adversely affected by the Commission's order in this case.

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

7. For the foregoing reasons, it will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, the Natural Resources Defense Council respectfully requests the Public Service Commission to grant the application to intervene.

/s/ Henry B. Robertson
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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