

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

In the Matter of KCP&L Greater Missouri )  
Operations Company’s Submission of its 2016 ) **File No. EO-2017-0270**  
Renewable Energy Standard Compliance Report )

In the Matter of KCP&L Greater Missouri )  
Operations Company’s Submission of its 2017 ) **File No. EO-2017-0272**  
Renewable Energy Standard Compliance Plan )

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

COMES NOW the Missouri Department of Economic Development –  
Division of Energy<sup>1</sup> (“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. On April 13, 2017, KCP&L Greater Missouri Operations Company (“GMO”) filed its 2016 Renewable Energy Standard Compliance Report (“Report”) and its 2017 Renewable Energy Standard Compliance Plan (“Plan”), as required by 4 CSR 240-20.100(8).

2. On April 13, 2017, the Commission issued an *Order Directing Notice and Setting Filing Deadline* (“Order”) which directed that Staff file a report of its review no later than May 30, 2017. In the same *Order*, the Commission also set a deadline of no later than May 30, 2017 for the Office of Public Counsel and any other interested person or entity to file comments on the Compliance Report and Compliance Plan.

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<sup>1</sup> 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....”

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.

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

Respectfully submitted,

*/s/ Brian Bear*

Brian Bear, Bar # 61957

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**Attorney for Missouri Department of Economic  
Development - Division of Energy**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served electronically on all counsel of record this 19<sup>th</sup> day of April, 2017.

*/s/ Brian Bear*