

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Resource Plan of) File No. EO-2018-0269
KCP&L Greater Missouri Operations Company)

APPLICATION TO INTERVENE OF NATURAL RESOURCES DEFENSE COUNCIL

Comes now the Natural Resources Defense Council (NRDC) and, pursuant to 4 CSR 240-2.075, applies to intervene herein and become a party for all purposes in respect to KCP&L-GMO's 2018 triennial IRP filing.

1. 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 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.

2. NRDC expects issues to arise in this case concerning MAP and RAP DSM, the effectiveness of GMO's DSM programs so far, the customer benefits and utility costs resulting from demand-side management and distributed renewable energy, and possibly issues of cost recovery and rate design concerning these resources. At this point NRDC does not know what position it will take on the issues in this case.

3. NRDC has a continuing interest in the success of demand-side programs in Missouri. NRDC participated in the MEEIA rulemaking and subsequent MEEIA implementation dockets. It was also a party to the MEEIA stipulation and agreement

reached with GMO in Case No. EO-2012-0008; and a party to GMO rate case ER-2012-0175 and IRP case EO-2015-0252.

4. 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. NRDC has intervened and/or provided testimony on these issues in public utility commission proceedings in many states, including Illinois, 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 resources, rate design, utility planning and other topics relevant to this proceeding.

5. Correspondence, communications, orders and decisions may be sent to the undersigned legal counsel.

6. NRDC has interests different from those of the general public or average ratepayer, which could be adversely affected by the decision in this case.

7. It will serve the public interest for NRDC to be allowed to intervene.

WHEREFORE, NRDC respectfully requests the Public Service Commission to grant this application to intervene.

/s/ Henry B. Robertson
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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 23d day of April, 2018, to all counsel of record.

/s/Henry B. Robertson
Henry B. Robertson