

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the 2013	)	
Kansas City Power & Light Co.'s	)	Case No. EO-2013-0537
Annual IRP Update Report	)	

**MOTION TO INTERVENE OF NRDC AND MOTION FOR EXPEDITED  
TREATMENT**

Comes now the Natural Resources Defense Council ("NRDC"), and pursuant to 4 CSR 240-2.075, applies to intervene herein.

1. NRDC was a party to KCPL's original IRP docket, EO-2012-0323 and therefore has a standing interest in the subject matter of this case.

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 Rebecca Stanfield at that address or at 312-651-7910. It has approximately 6000 members in Missouri as of this date, many of whom are KCPL ratepayers. NRDC and its members are interested in promoting energy efficiency, peak demand reduction and renewable energy resources to meet Missouri's energy needs. NRDC seeks to intervene in this proceeding in order that its members and others may benefit from well designed and cost-effective energy efficiency programs and a corresponding reduction in coal-fired 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. NRDC has intervened and/or provided testimony on these issues in public utility commission proceedings in many states, including Missouri, 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.

3. NRDC's interests focus on environmental protection and hence are different from those of the general public and could be adversely affected by an order approving inadequate levels of DSM programs or continued utilization of excess coal-based generating capacity.

4. KCPL recently made filings in this docket, some of which are labeled Highly Confidential. KCPL has scheduled an update workshop, as required by 4 CSR 240-22.080(3), on July 11. Because NRDC's consultants and attorneys need to be familiar with the filings before that date, we request expedited treatment of this motion.

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

6. 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  
Henry B. Robertson (Mo. Bar No. 29502)  
Great Rivers Environmental Law Center  
705 Olive Street, Suite 614  
St. Louis, Missouri 63101  
(314) 231-4181  
(314) 231-4184  
[hrobertson@greatriverslaw.org](mailto:hrobertson@greatriverslaw.org)  
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 28th day of June, 2013, to all counsel of record:

/s/ Henry B. Robertson