

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 SIERRA CLUB AND MOTION FOR  
EXPEDITED TREATMENT**

Comes now the Sierra Club, and pursuant to 4 CSR 240-2.075, applies to intervene herein.

1. The Club 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. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 700,000 members nationally, and members who reside in KCPL's Missouri service territory and are KCPL ratepayers. The Missouri Chapter of the Club has an office at 7164 Manchester, St. Louis, MO 63143; email john.hickey@sierraclub.org; telephone 314-644-1011. Sierra Club exists for the purposes of preserving and protecting environmental values, and for years has been actively concerned with protecting air and water quality throughout the state of Missouri. Sierra Club's interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if KCPL aggressively pursues energy efficiency and demand response programs and renewable energy initiatives that displace fossil fuel generation. Sierra Club is concerned with the build-up of greenhouse gases which lead to global warming, and with pollution from non-renewable sources which cause a host of health problems including asthma, mercury

poisoning, sudden infant death syndrome, respiratory problems, and other problems. Sierra Club has been actively encouraging the use of energy efficiency and renewable energy sources.

3. The Sierra Club'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), for July 11. Because Sierra Club'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 they will take in this case.

6. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, the Sierra Club 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