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

In the Matter of the Joint Application of Great Plains	)	
Energy Incorporated, Kansas City Power & Light	)	
Company and KCP&L Greater Missouri Operations	)	<b>Docket No. EE-2017-0113</b>
Company for a Variance from 4 CSR 240-20.015	)	

## APPLICATION FOR INTERVENTION OF BRIGHTERGY, LLC

COMES NOW Brightergy, LLC ("Brightergy") and in support of its Application for Intervention states the following:

- 1. Brightergy is a limited liability company organized under the laws of the State of Missouri with its principal place of business at 1712 Main Street, 6th Floor, Kansas City, MO, 64108.
- 2. The issues Great Plains Energy ("GPE", or the "Company") raises in this docket impact primary areas of business for Brightergy, which include the installation of solar photovoltaic systems. Each of these will have a direct impact on Brightergy's business operations.
- 3. Brightergy operates in every service territory affected in this docket, including Kansas City Power & Light Company Missouri, Kansas City Power & Light Company Kansas, KCP&L-Greater Missouri Operations Company, and Westar.
- 4. Integrations of the operations of the GPE entities and Westar will necessarily impact critical areas of business interest for Brightergy, including, but not limited to, solar interconnection standards and process and the processing of applications for incentives and rebates related to energy efficiency. These are primary areas of business interest to Brightergy.
- 5. No other party to this docket will adequately represent Brightergy's interests. An adverse order in this docket could affect Brightergy's interests and business operations across all of GPE's combined service territories.

6. The Commission should exercise its broad discretion under 4 CSR 240-2.075 in

order to hear from stakeholders regarding these very important issues. This docket is the only

opportunity for many stakeholders to investigate the merger and its possible consequences to

their various interests. The Commission can, and should, permit broad participation in this

docket.

7. Brightergy's unique set of expertise will provide a perspective to the

Commission's decision making that would otherwise be lacking, and it is therefore in the

public's interest to allow Brightergy to intervene.

8. Correspondence, communications, orders and decisions in this case may be

directed to Brightergy's undersigned legal counsel.

9. Brightergy does not yet have a position on the issues in this case and reserves the

right to take positions on specific issues as this case proceeds.

WHEREFORE, Brightergy respectfully requests that the Commission grant is

Application for Intervention in the above-styled case.

Respectfully submitted,

/s/ Andrew Zellers

Andrew Zellers MO. Bar No. 57884

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Attorney for Brightergy, LLC

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been served electronically this 26th day of October, 2016, to all parties on the Commission's service list in this case.

/s/ Andrew Zellers