

**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)	<u>File No. EE-2017-0113</u>
Company for a Variance from the Commission's)	
Affiliate Transactions Rule, 4 CSR 240-20.015)	

APPLICATION TO INTERVENE OF RENEW MISSOURI

COMES NOW, Earth Island Institute d/b/a Renew Missouri ("Renew Missouri"), pursuant to rule 4 CSR 240-2.075 and the Commission's October 14, 2016 *Order Directing Notice and Setting Intervention Deadline*, and applies to intervene in the above-styled case. In support of its Application, Renew Missouri states:

1. On October 12, 2016, Great Plains Energy Incorporated ("Great Plains"), Kansas City Power & Light ("KCP&L"), and Kansas City Power and Light Greater Missouri Operations Company ("GMO"), collectively "Joint Applicants" filed their *Application for a Limited Variance from the Commission's Affiliate Transactions Rule*.

2. Also on October 12, 2016, the Joint Applicants filed a Stipulation and Agreement purporting to settle the issues of this case.

3. On October 14, 2016, the Commission issued its *Order Directing Notice and Setting Intervention Deadline*, which set an intervention deadline of October 26, 2016 and directed parties to respond whether they object to the Non-Unanimous Stipulation and Agreement.

4. Earth Island Institute is a nonprofit corporation organized under the laws of California and has a Certificate of Authority for a Foreign Nonprofit granted by the Missouri Secretary of State. Renew Missouri is a registered fictitious name of Earth Island Institute under § 417.200 RSMo., with its principal place of business at 1200 Rodgers St, Suite B, Columbia,

MO 65201. Renew Missouri is a not-for-profit clean energy policy and advocacy group whose mission is to transform Missouri into a leading state in renewable energy and energy efficiency.

5. As advocates for the furtherance of renewable energy and energy efficiency investment, as well as best-practices clean energy policy in Missouri, Renew Missouri is interested in how Great Plains' purchase of a Kansas utility may affect the Company's clean energy commitments either directly or indirectly. In addition to its clean energy interests, Renew Missouri has an interest in ensuring that Missouri stakeholders have an opportunity to provide input on major transactions affecting utilities under the jurisdiction of the Missouri Public Service Commission. While this case purports to be merely a request for waiver, approval of the Stipulation and Agreement would effectively amount to approval of the merger between Great Plains and Westar.

6. Renew Missouri's interests are different than those of the general public and may be adversely affected by a final order arising from this case. Granting Renew Missouri intervention will serve the public interest by assisting the Commission's record for decisions in this case, and no party will be adversely affected by such intervention.

7. Renew Missouri does not object to and takes no further position on the October 12, 2016 Stipulation and Agreement submitted by the Joint Applicants in this case.

8. Pleadings, notices and other correspondence in this case should be directed to:

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Columbia, MO 65201
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WHEREFORE, Renew Missouri submits this Application to Intervene and respectfully requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully Submitted,

/s/ Andrew J. Linhares

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ATTORNEY FOR RENEW MISSOURI
ADVOCATES d/b/a RENEW MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was mailed, faxed, or emailed to all counsel of record on this 26th day of October 2016.

/s/ Andrew J. Linhares

Andrew J. Linhares