

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

In the Matter of the Resource Plan of)	
KCP&L Greater Missouri Operations)	Case No. EO-2013-0538
Company)	

**MISSOURI DEPARTMENT OF NATURAL RESOURCES'
APPLICATION TO INTERVENE**

COMES NOW Missouri Department of Natural Resources (MDNR) and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully requests that the Commission issue its order granting MDNR's Application to Intervene. For its Application, MDNR states as follows:

1. On June 20, 2013, KCP&L Greater Missouri Operations Company filed its Integrated Resource Plan (IRP) with the Missouri Public Service Commission (Commission).

2. MDNR, and specifically its Division of Energy, is a state agency vested with the powers and duties set forth in § 640.150 RSMo.

3. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that the Division of Energy will be looking at the proposed filing from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. The Division of Energy's review also will be in relation to the mandate set forth in § 640.150 RSMo. which includes planning for energy resource development; analyzing energy management issues; consulting and

cooperating with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; assessing the potential impacts on environmental quality; and analyzing the potential for increased use of energy alternatives and making recommendations for the expanded use of such alternate energy sources and technologies.

4. Communications, correspondence, orders and decision in this matter should be addressed to:

Jessica L. Blome
Assistant Attorney General
P.O. Box 899
Jefferson City, Missouri 65102
Phone: 573-751-3640
Fax: 573-751-8796
Email: jessica.blome@ago.mo.gov

with a copy to:

Mary Ann Young
Division of Energy
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City MO 65102
Phone: 573-751-3335
Fax: 573-526-7553
Email: DNREnergyCases@dnr.mo.gov

5. MDNR is uncertain at this time of the position it will take in this case.

WHEREFORE, the MDNR respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

CHRIS KOSTER

Attorney General

/s/ Jessica L. Blome

JESSICA L. BLOME

Missouri Bar No. 59710

Assistant Attorney General

P.O. Box 899

Jefferson City, Missouri 65102

Phone: 573-751-3640

Fax: 573-751-8796

**Attorney for Missouri Department of
Natural Resources**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served
electronically on all counsel of record this 28th day of June, 2013.

/s/ Jessica L. Blome

Jessica L. Blome

Assistant Attorney General