

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

In the Matter of the Application of KCP&L Greater)	
Missouri Operations Company for Permission and)	
Approval of a Certificate of Public Convenience and)	
Necessity Authorizing it to Construct, Install, Own,)	File No. EA-2015-0256
Operate, Maintain and Otherwise Control and Manage)	
Solar Generation Facilities in Western Missouri)	

**UNITED FOR MISSOURI, INC.
APPLICATION TO INTERVENE**

COMES NOW United for Missouri, Inc. (“UFM”) and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully requests that the Commission issue its order granting UFM’s Application to Intervene. For its Application, UFM states as follows:

1. On November 12, 2015, KCP&L Greater Missouri Operations Company (“GMO”) filed an application with the Missouri Public Service Commission requesting a Certificate of Convenience and Necessity (“CCN”) pursuant to Section 393.170, RSMo. The CCN would authorize GMO to construct, install, own, operate, maintain and otherwise control and manage solar generation facilities in Jackson County, Missouri.

2. On November 13, 2015, the Commission issued an *Order Directing Notice of Contested Case and Setting Intervention Deadline*. In its November 13, 2015 Order, the Commission established an intervention deadline of no later than December 7, 2015.

3. UFM is a nonprofit mutual benefit corporation organized under the laws of the state of Missouri. Formed in July 2010, UFM has over 80,000 members and is committed to serving its members and the public in educating the public about and supporting economic policies in the state that will achieve growth, opportunity and prosperity. UFM seeks to help state legislators, state-wide elected officials, state agencies, the media and individual citizens

understand why the American free enterprise system is the best method of ensuring prosperity for all Missourians.

4. UFM's interest is different than the interest of the general public. UFM's intervention and participation in this proceeding would serve the public interest in that it will provide the Commission with UFM's perspective. UFM seeks to become a party to this case for all purposes.

5. In general, UFM opposes statutory mandates on the economy. Such mandates distort the efficiency of the free market and inherently indicate that the investment would not be made but for the mandate. In the utility industry, such mandates harm ratepayers by artificially increasing costs and, therefore, rates. However, recognizing the existing legal mandates of the Missouri Renewable Energy Standard, UFM takes no position on the application at this time, but it reserves the right to modify its position based upon evidence adduced in these proceedings.

WHEREFORE, for the foregoing reasons, United for Missouri respectfully requests the Commission grant its Application to Intervene in this matter.

Respectfully submitted,

By: /s/ David C. Linton

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Filed: December 4, 2015

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Application to Intervene was sent to all parties of record in File No. EA-2015-0256 via electronic transmission this 4th day of December, 2015.

/s/ David C. Linton