

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

In the Matter of the Application of Great Plains            )  
Energy Incorporated for Approval of its Merger            )  
with Westar Energy, Inc.    )        **File No. EM-2018-0012**

**MISSOURI DIVISION OF ENERGY’S  
MOTION TO INTERVENE**

COMES NOW the Missouri Department of Economic Development –  
Division of Energy<sup>1</sup> (“DE”) and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully  
requests that the Missouri Public Service Commission (“Commission”) grant intervention to  
DE in the above-styled matter. For its Motion to Intervene, DE states as follows:

1. On August 31, 2017, Great Plains Energy Incorporated, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, and Westar Energy, Inc. filed an *Application for Approval of Merger, Request For Variance from CSR 240-20.015, and Motion For Expedited Treatment*, as well as a *Motion for Approval to Present Certain Witnesses as a Panel* and the Direct Testimonies of several witnesses.
2. On September 6, 2017, the Commission issued its *Order Directing Notice and Setting Intervention Date and Procedural Conference*. This *Order* set September 27, 2017 as the deadline for intervention.

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<sup>1</sup> On August 28, 2013, Executive Order 13-03 transferred, “... all authority, powers, duties, functions, records, personnel, property, contracts, budgets, matters pending, and other pertinent vestiges of the Division of Energy from the Missouri Department of Natural Resources to the Missouri Department of Economic Development ....”

3. DE is a state agency vested with the powers and duties set forth in, *inter alia*, §§ 640.150 and 640.676 RSMo.

4. DE's interests are different than those of the general public, as illustrated by its statutory authority to plan for future energy needs and energy resource development; develop, promote, administer and monitor energy conservation programs;<sup>2</sup> consult and cooperate with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; and analyze the potential for increased use of energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.<sup>3</sup> DE's intervention, moreover, will serve a public interest, as DE will evaluate the filings from a formal state policy and planning perspective consistent with its interests in clean, affordable, abundant energy, and its efficient use.

5. DE expects to develop its positions on specific issues as this case proceeds.

6. Communications, correspondence, orders, and decisions in this matter should be addressed to the undersigned.

WHEREFORE, the Missouri Department of Economic Development – Division of Energy respectfully requests that it be allowed to intervene in this case.

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<sup>2</sup> §§ 640.676 and 640.150.2 RSMo.

<sup>3</sup> § 640.150.1 RSMo.

Respectfully submitted,

/s/ Michael Lanahan

Michael Lanahan, Bar # 67487

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**Attorney for Missouri Department of Economic  
Development – Division of Energy**

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 8<sup>th</sup> day of September, 2017.

/s/ Michael Lanahan

Michael Lanahan