

**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)	

MOTION TO INTERVENE OF RENEW MISSOURI

Comes now Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”), and pursuant to 4 CSR 240-2.075, applies to intervene herein. For its Motion, Renew Missouri states:

1. Earth Island Institute is a non-profit corporation organized under the laws of California with its principal place of business at 2150 Allston Way, Suite 460, Berkeley, CA 94704. Earth Island 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 910 E. Broadway, Suite 205, Columbia, MO 65201. Renew Missouri is a non-profit policy group whose mission is to transform Missouri into a leading state in renewable energy and energy efficiency by 2016.

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

Andrew J. Linhares
Staff Attorney, Renew Missouri
910 E. Broadway, Ste. 205
Columbia, MO 65201
(314) 471-9973
(314) 558-8450
andrew@renewmo.org

3. Renew Missouri was a party to Kansas City Power & Light Company-Greater Missouri Operations (“KCP&L-GMO”) original IRP docket, EO-2012-0324, and therefore has a standing interest in the subject matter of this case.

4. On June 20, 2013, KCP&L-GMO filed information regarding their 2013 Integrated Resource Plan (“IRP”) Annual Update in this case, pursuant to the Chapter 22 reporting

requirements. KCP&L-GMO's filing includes information regarding its anticipated demand-side management ("DSM") programs.

5. Renew Missouri has an interest in the environmental, economic, business, and health benefits of energy efficiency in Missouri. Renew Missouri's interests are different from those of the general public and could be adversely affected by a final order in this case.

3. Granting Renew Missouri's Motion to Intervene will serve the public interest by assisting the Commission's record for decision in this case. Renew Missouri advocates for the widespread public benefits that utility-scale energy efficiency programs can bring to ratepayers and the Missouri public. In addition, Renew Missouri's expert(s) will bring technical expertise and nationwide perspectives to the areas of DSM program design and implementation that may not otherwise be represented in this case. No party will be adversely affected by such intervention.

4. Movant has not yet taken a position in this case.

5. WHEREFORE, Renew Missouri respectfully requests that the Commission grant this Motion to Intervene, along with any further relief the Commission deems proper.

Respectfully Submitted,

/s/ Andrew J. Linhares

Andrew J. Linhares, # 63973

910 East Broadway, Ste. 205

Columbia, MO 65201

T: (314) 471-9973

F: (314) 558-8450

Andrew@renewmo.org

ATTORNEY FOR RENEW MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was either mailed, faxed or emailed to all counsel of record on this 11th day of July, 2013.

/s/ Andrew J. Linhares

Andrew J. Linhares