

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

In the Matter of Kansas City Power & Light        )  
Company's Request for Authority to Implement    )     File No. ER-2014-0370  
a General Rate Increase for Electric Service    )

**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 October 30, 2014, Kansas City Power & Light Company (“KCP&L”) filed with the Commission a tariff to implement a general rate increase for electric utility service.
2.     On October 31, 2014, the Commission issued its *Order Directing Notice, Setting Intervention Deadline, and Setting Procedural Conference*, which set an intervention deadline of November 20, 2014.
3.     DE is a state agency vested with the powers and duties set forth in, *inter alia*, §§ 640.150 and 640.676 RSMo.

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<sup>1</sup> Effective August 29, 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 . . . .”

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 decision in this matter should be addressed to the undersigned with a copy to [DEDEnergyCases@ded.mo.gov](mailto:DEDEnergyCases@ded.mo.gov).

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

<sup>3</sup> § 640.150.1 RSMo.

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

Respectfully submitted,

*/s/ Jeremy Knee* \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 6th day of November, 2014.

*/s/ Jeremy Knee* \_\_\_\_\_

Jeremy Knee