

**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,)
Operate, Maintain and Otherwise Control and Manage)
Solar Generation Facilities in Western Missouri)

File No. EA-2015-0256

MISSOURI DIVISION OF ENERGY
APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Economic Development –

Division of Energy¹ (“Division of Energy”) and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully requests that the Commission issue its order granting the Division of Energy’s Application to Intervene. For its Application, the Division of Energy 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”) as authorized by Section 393.170, RSMo 2000. The CCN would authorize GMO to construct, install, own, operate, maintain and otherwise control and manage solar generation facilities in Jackson County, Missouri.

¹ The Division of Energy was transferred from the Department of Natural Resources (DNR) to the Department of Economic Development (DED) on August 29, 2013 by Executive Order 13-03. The Executive Order transfers “[A]ll 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...”

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. The Division of Energy is a state agency vested with the powers and duties set forth in Section 640.150, 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;² 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.³ 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. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned with a copy to DEDEnergyCases@ded.mo.gov.
6. The Division of Energy is uncertain at this time of the position it will take in this case.

² §§ 640.676 and 640.150.2 RSMo.

³ § 640.150.1 RSMo.

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

Respectfully submitted,

/s/ Alexander Antal

Alexander Antal

Associate General Counsel

Missouri Bar No. 65487

Department of Economic Development

P.O. Box 1157

Jefferson City, MO 65102

Phone: 573-522-3304

Fax: 573-526-7700

alexander.antal@ded.mo.gov

Attorney for Missouri Division of Energy

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 18th day of November, 2015.

/s/ Alexander Antal

Alexander Antal