

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of)	
the Resource Plan of)	File No. EO-2015-0252
KCP&L Greater Missouri Operations Company)	

In the Matter of)	
the Resource Plan of)	File No. EO-2015-0254
Kansas City Power & Light Company)	

APPLICATION TO INTERVENE OF SIERRA CLUB

Comes now Sierra Club, and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, Sierra Club states the following.

1. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 600,000 members nationally and over 8,800 members in Missouri, many of whom reside in KCPL's and GMO's service territory and are KCPL or GMO ratepayers. The Missouri Chapter of Sierra Club has an office at 7164 Manchester, St. Louis, MO 63143; email john.hickey@sierraclub.org; telephone 314-644-1011. Sierra Club exists for the purpose of preserving and protecting environmental values. Consistent with this mission, Sierra Club for many years has advocated for transitioning the electricity sector from coal-fired generation to cleaner and lower cost forms of energy, such as energy efficiency and renewable energy sources. Sierra Club's interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if KCPL and GMO aggressively pursue renewable energy, energy efficiency, and demand response

programs that displace fossil fuel generation. Sierra Club is concerned with emissions of greenhouse gases that lead to global warming, and with pollution from non-renewable sources that cause a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, respiratory problems, and other problems.

2. Sierra Club participated in the MEEIA rulemaking docket EX-2010-0368. It was a party to GMO's 2013 and 2014 IRP updates (dockets EO-2013-0538 and EO-2014-0257, respectively), and the MEEIA stipulation and agreement reached with GMO in Case No. EO-2012-0008. It was a party to KCP&L's 2012 IRP, Case No. EO-2012-0323, and the 2013 and 2014 IRP updates (EO-2013-0537 and EO-2014-0256, respectively); the MEEIA stipulation and agreement reached with KCP&L in Case No. EO-2012-0009; the KCP&L rate case ER-2012-0174; and is a party to the current KCP&L rate case, ER-2014-0370.

3. Sierra Club's interest in promoting cleaner and lower cost forms of energy is different from those of the general public and could be adversely affected by an order approving prolonged reliance on aging coal plants, inadequate levels of DSM programs, and continued discouragement of renewable generation. Moreover, Sierra Club's staff and consultants have unique and extensive experience in analyzing the feasibility and cost-effectiveness of coal and its alternatives. Sierra Club's intervention would serve the public interest in prudent resource planning, public health, and the curtailment of greenhouse gas emissions.

4. Sierra Club is not yet certain of the position it will take in this case.

5. It will serve the public interest for the PSC to grant this application to

intervene.

WHEREFORE, Sierra Club respectfully requests the Public Service Commission to grant the application to intervene.

/s/ Henry B. Robertson
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 17th day of April, 2015, to all counsel of record.

/s/ Henry B. Robertson
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