

**BEFORE THE KANSAS CORPORATION COMMISSION
OF THE STATE OF KANSAS**

Received
on

AUG 06 2013

In the Matter of the Application of Kansas)
City Power & Light Company for Approval) Docket No. 14-KCPE-042-TAR
To Extend its Demand-Side Management)
Programs)

by
State Corporation Commission
of Kansas

COMES NOW the Climate Energy Project and states as follows:

1. The Climate Energy Project ("CEP") is located in Lawrence, Kansas. It began as a project of the highly-renowned Land Institute located in Salina, Kansas. CEP is now a separately incorporated nonprofit. Its goal is to support the cost-effective, sustainable deployment of energy efficiency and renewable energy to reduce greenhouse gas emissions.

2. The mission of CEP is to infuse certain core values into community, regional, and national discussion that include: 1) stewardship of the earth's resources, 2) developing flexible energy systems, 3) balancing the benefits and burdens of energy technologies and 4) supporting the creative implementation of renewable and energy efficiency technologies that are environmentally and socially sustainable. CEP maintains an extensive website at <http://www.climateandenergy.org/> in order to pursue and accomplish its mission.

3. CEP has a demonstrated interest in energy efficiency and demand side management programs in Kansas. For example, CEP intervened in Docket No. 10-KCPE-795-TAR and Docket No. 12-GIMX-337-GIV that focused energy efficiency and demand side management programs and the regulatory treatment related thereto. Intervention in the instant docket will further CEP's demonstrated interests in energy efficiency and demand side management.

4. CEP can creatively and constructively provide valuable information and comment on energy efficiency policies and regulated utility programs that most effectively and efficiently accomplish those policies with full consideration of long-term environmental consequences, costs and benefits. No outside party other than CEP can adequately and efficiently represent these particular interests in this proceeding. CEP has a unique interest in promoting the long-term health of the environment, which will in turn benefit the long-term economic interests of the people of Kansas. Through the expansion of energy efficiency and the resulting reduction in greenhouse gases, the Kansas contribution to and economic impact of climate change can be reduced.

5. On August 1, 2013, the Commission entered an order in this docket that, *inter alia*, stayed this proceeding pending completion of EM&V of KCP&L's extant DSM programs. CEP seeks to be part of the process in this docket in order to determine the efficacy of the subject DSM programs. Further, CEP intends to work with the parties to craft DSM programs that meet the needs of ratepayers to conserve energy consumption without unreasonable rate impacts and without causing unnecessary or unwarranted financial burdens on KCP&L.

6. Granting intervention to the CEP is in the interest of justice and will not impair the orderly and prompt conduct of the proceedings in this matter.

WHEREFORE, the CEP respectfully requests that it be granted intervention in this Docket, and that as an intervenor it be granted full rights of participation, including the right to relevant discovery related to issues pending, and the right to present and sponsor witnesses and evidence, to cross-examine witnesses, to file briefs and pleadings and to offer oral argument and participate in hearings.

Respectfully submitted,
The Climate Energy Project, Petitioner




Robert V. Eye, No. 10689
KAUFFMAN & EYE
123 S.E. 6th Avenue, Suite 200
Topeka, Kansas 66603-3850
785-234-4040 Phone
785-234-4260 Fax
bob@kauffmaneye.com
Attorneys for Petitioner

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

Robert V. Eye, of lawful age, being first duly sworn upon oath, deposes and states: That he is an attorney for the Climate Energy Project, that he has read the above and foregoing *Petition for Intervention* and that the statements therein contained are true according to his knowledge, information and belief.



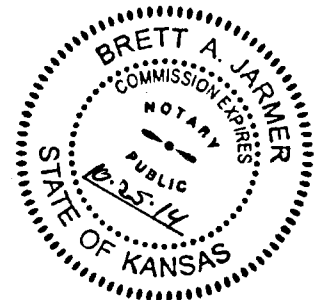
Robert V. Eye

Subscribed and sworn to before me this 6th day of August, 2013.

My appointment expires: 10-25-14



Notary Public



CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, 2013 an original and seven copies of the above and foregoing were hand delivered to the Executive Director, Kansas Corporation Commission, 1500 S.W. Arrowhead Road, Topeka, Kansas 66604, and that true and correct copies were served electronically on the following:

GLEND A CAFER, ATTORNEY
CAFER LAW OFFICE, L.L.C.
3321 SW 6TH ST
TOPEKA, KS 66606

TERRI PEMBERTON, ATTORNEY
CAFER LAW OFFICE, L.L.C.
3321 SW 6TH ST
TOPEKA, KS 66606

NIKI CHRISTOPHER, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604

C. STEVEN RARRICK, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604

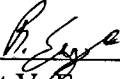
DAVID SPRINGE, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604

HEATHER A. HUMPHREY, GENERAL COUNSEL
KANSAS CITY POWER & LIGHT COMPANY
ONE KANSAS CITY PL, 1200 MAIN ST (64105)
PO BOX 418679
KANSAS CITY, MO 64141-9679

ROGER W. STEINER, CORPORATE COUNSEL
KANSAS CITY POWER & LIGHT COMPANY
ONE KANSAS CITY PL, 1200 MAIN ST (64105)
PO BOX 418679
KANSAS CITY, MO 64141-9679

BRIAN G. FEDOTIN, ADVISORY COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027

ANDREW FRENCH, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027



Robert V. Eye