

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

In the Matter of the Application of                    )  
Westar Energy, Inc. and Kansas Gas and            )  
Electric Company for Approval of                    )  
Energy Efficiency Programs                            )       **Docket No. 15-WSEE-181-TAR**

**PETITION TO INTERVENE**

COMES NOW Brightergy, LLC (“Brightergy”) and in support of its Petition to Intervene states as follows:

1. Brightergy is a limited liability company organized under the laws of the State of Missouri with its principal place of business at 1617 Main Street, 3rd Floor, Kansas City, MO, 64108.

2. The issues Westar raises in this docket impact a primary area of business for Brightergy, providing energy efficiency solutions for private companies, school districts, and municipalities, among many other clients.

3. Because of Brightergy’s business in energy efficiency, the Commission’s holdings regarding Westar’s programs have the potential to impact Brightergy either positively or negatively.

4. Pursuant to K.S.A. § 77-521 and K.A.R. § 82-1-225, Brightergy is qualified to intervene in this docket.

5. Brightergy is involved in discussions regarding related energy efficiency programs in the State of Missouri, and has experience with similar programs under other investor-owned utilities. As such, Brightergy can provide a unique set of experiences which will inform the Commission’s deliberative process.

6. No other party in this proceeding will adequately represent Brightergy’s interests.

7. No party to this proceeding will be prejudiced by granting the requested intervention.

8. Brightergy is requesting intervention to file and comment on all subjects to be covered in this docket.

9. All communications and correspondence to Brightergy, including services of all notices and orders of the Commission herein are requested to be sent to the following named individual:

Andrew J. Zellers  
General Counsel/Vice President for Regulatory Affairs  
1617 Main Street, 3rd Floor  
Kansas City, MO, 64108  
(816) 866-0555 Telephone  
(816) 511-0822 Fax  
Email: [andy.zellers@brightergy.com](mailto:andy.zellers@brightergy.com)

WHEREFORE, Brightergy respectfully moves the Commission for an Order allowing it to intervene in this case and to become a party of record with all rights to have notice and fully participate in this matter, including, but not limited to, the right to file briefs and motions, to participate in argument, and to conduct discovery, and for all other necessary and proper purposes.

Dated December 15, 2014

Respectfully submitted,

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Andrew J. Zellers #24757  
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