BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

)	Case No. EM-2018-0012
)

THE FEDERAL EXECUTIVE AGENCIES PETITION TO INTERVENE

Attached please find the Federal Executive Agencies (FEA) Petition to Intervene. Copies have been served to all parties on the attached Certificate of Service. Please place this document on file.

Attorneys for Federal Executive Agencies

Bv:

Andrew J. Unsicker Lanny L. Zieman Thomas A. Jernigan AFLOA/JACE-ULFSC

139 Barnes Drive, Suite 1

Tyndall Air Force Base, Florida 32403

Org box E-mail: <u>ULFSC.Tyndall@us.af.mil</u>

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Great Plains Energy Incorporated for Approval of its Merger With Westar Energy, Inc.)	Case No. EM-2018-0012
with westar energy, inc.	,)	

THE FEDERAL EXECUTIVE AGENCIES PETITION TO INTERVENE

Pursuant to this Commission's Rules of Practice and Procedure, 4 C.S.R. 240-2.075, the Federal Executive Agencies (FEA) hereby submits this Request for Intervention.

The FEA consists of certain agencies of the United States Government which have offices, facilities, and or installations in the service area of KCP&L Greater Missouri Operations Company (GMO), and which offices, facilities, and/or installations purchase utility service from GMO. The Department of Defense has been delegated authority by the General Services Administration, to the Department of the Air Force counsel, to represent the consumer interests of the FEA in this proceeding.

Chief among these Federal customers in this case is Whiteman Air Force Base, Missouri. Electricity costs represent one of the largest variable expenses of operating the Federal offices, facilities, and installations on whose behalf intervention is sought herein, and all will be affected by any action this Commission takes in this Docket. For the above-mentioned reasons, the FEA have a substantial interest in this Docket and intervention would serve the public interest as tax dollars are used to pay for energy at our installations.

FEA notes that this Intervention request is a late filing as the deadline established in the September 6, 2017 memorandum setting up intervention set a deadline of September 27, 2017. FEA just recently became aware of the impact a decision in the above docket may have on FEA customers and the Air Force, specifically Whiteman Air Force Base. FEA states that it accepts the record established in that case, including the requirements of any orders of the commission, as of the date the motion is filed.

Major Andrew Jay Unsicker is not licensed to practice law in the State of Missouri. He is admitted to practice law before the courts in the State of Maryland. Major Unsicker has been in active practice since 2004. Major Unsicker is not under suspension or disbarment by any of the courts of the state in which he is admitted to practice. No one who practices in my office has been disqualified from practicing in any jurisdiction to which they are or have been admitted. FEA will in the future petition for leave to appear *pro hac vice* herein. FEA respectfully requests that this application be granted, pending completion and approval of that petition. I hereby designate Thomas Schmidt, Major, US Air Force Reserve (USAFR), 11 Hillcrest Pl, St. Louis, MO 63122, telephone (314)496-8904, Missouri Attorney Bar No.59700, as associate counsel. However, please note that Major Schmidt does not need to be served filings in the Docket. Major Schmidt will be counsel identified in our petition for leave to appear *pro hac vice*.

The FEA request intervention solely in their capacity as customers of GMO. The counsel filing this petition is the duly authorized representative of the FEA in GMO's service area. The name, address, telephone number, and other relevant information pertaining to Petitioner's counsel of record for purposes of service and correspondence during the course of this proceeding is:

Andrew J. Unsicker, Maj, USAF AFLOA/JACE-ULFSC 139 Barnes Drive, Suite 1 Tyndall Air Force Base, Florida 32403

Phone: (850) 283-6347

E-mail: Andrew.Unsicker@us.af.mil

<u>ULFSC.Tyndall@us.af.mil</u>

Natalie A. Cepak, Capt, USAF AFLOA/JACE-ULFSC 139 Barnes Drive, Suite 1 Tyndall Air Force Base, Florida 32403

Phone: (850) 283-6348

E-mail: Natalie.Cepak.2@us.af.mil

Lanny L. Zieman, Capt, USAF AFLOA/JACE-ULFSC 139 Barnes Drive, Suite 1 Tyndall Air Force Base, Florida 32403

Phone: (850) 282-8863

E-mail: Lanny.Zieman,1@us.af.mil

Thomas A. Jernigan AFCEC/JA-ULFSC 139 Barnes Drive, Suite 1 Tyndall Air Force Base, Florida 32403

Phone: (850) 283-6663

E-mail: Thomas.Jernigan.3@us.af.mil

WHEREFORE, the FEA request that the Commission grant the Request to Intervene and that the FEA be accorded full party status in the above-mentioned Docket.

Respectfully submitted this 11th day of October, 2017.

Attorneys for Federal Executive Agencies

Andrew J. Unsicker

Lanny L. Zieman

Natalie A. Cepak

Thomas A. Jernigan

AFLOA/JACE-ULFSC

139 Barnes Drive, Suite 1

Tyndall Air Force Base, Florida 32403

Org box E-mail: <u>ULFSC.Tyndall@us.af.mil</u>

(850) 283-6347

Andrew.Unsicker@us.af.mil

Lanny.Zieman.1@us.af.mil

Natalie.Cepak,2@us.af.mil

Thomas.Jernigan.3@us.af.mil

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or emailed to all parties listed on the official service list on this 11th day of October, 2017:

Missouri Public Service Commission

Staff Counsel Department 200 Madison Street, Suite 800 P.O. Box 360 Jefferson City, MO 65102 staffcounselservice@psc.mo.gov

Office of the Public Counsel

Hampton Williams 200 Madison Street, Suite 650 P.O. Box 2230 Jefferson City, MO 65102 opcservice@ded.mo.gov

Brightergy, LLC

Andrew Zellers 1712 Main Street, 6th Floor Kansas City, MO 64108 andyzellers@brightergy.com

City of Independence, Missouri

Dayla Schwartz 111 E. Maple St. Independence, MO 64050 dschwartz@indepmo.org

Consumers Council of Missouri

John B Coffman 871 Tuxedo Blvd. St. Louis, MO 63119-2044 john@johncoffman.net

Great Plains Energy Incorporated

Larry W Dority 101 Madison, Suite 400 Jefferson City, MO 65101 lwdority@sprintmail.com

Great Plains Energy Incorporated

James M Fischer 101 Madison Street, Suite 400 Jefferson City, MO 65101 jfischerpc@aol.com

Great Plains Energy Incorporated

Robert Hack 1200 Main, 19th Floor P.O. Box 418679 Kansas City, MO 64141-9679 rob.hack@kcpl.com

Great Plains Energy Incorporated

Roger W Steiner 1200 Main Street, 19th Floor P.O. Box 418679 Kansas City, MO 64105-9679 roger.steiner@kcpl.com

Great Plains Energy Incorporated

Karl Zobrist 4520 Main Street, Suite 1100 Kansas City, MO 64111 karl.zobrist@dentons.com

Kansas City Power & Light Company

Larry W Dority 101 Madison, Suite 400 Jefferson City, MO 65101 lwdority@sprintmail.com

Kansas City Power & Light Company

James M Fischer 101 Madison Street, Suite 400 Jefferson City, MO 65101 jfischerpc@aol.com

Kansas City Power & Light Company

Robert Hack 1200 Main, 19th Floor P.O. Box 418679 Kansas City, MO 64141-9679 rob.hack@kcpl.com

Kansas City Power & Light Company

Roger W Steiner 1200 Main Street, 19th Floor P.O. Box 418679 Kansas City, MO 64105-9679 roger.steiner@kcpl.com

Kansas Electric Power Cooperative, Inc.

Frank A Caro 900 W. 48th Place, Suite 900 Kansas City, MO 64112 fcaro@polsinelli.com

Kansas Electric Power Cooperative, Inc.

Susan Henderson Moore P.O. Box 1069 Jefferson City, MO 65102 sbhenderson@polsinelli.com

Kansas Electric Power Cooperative, Inc.

Andrew O Schulte 900 W. 48th Place, Suite 900 Kansas City, MO 64112-6411 aschulte@polsinelli.com

KCP&L Greater Missouri Operations Company Larry W Dority

101 Madison, Suite 400 Jefferson City, MO 65101 lwdority@sprintmail.com

KCP&L Greater Missouri Operations Company James M Fischer

101 Madison Street, Suite 400 Jefferson City, MO 65101 jfischerpc@aol.com

KCP&L Greater Missouri Operations Company

Robert Hack 1200 Main, 19th Floor P.O. Box 418679 Kansas City, MO 64141-9679 rob.hack@kcpl.com

KCP&L Greater Missouri Operations Company Roger W Steiner 1200 Main Street, 19th Floor P.O. Box 418679

P.O. Box 418679 Kansas City, MO 64105-9679 roger.steiner@kcpl.com

Midwest Energy Consumers Group

David Woodsmall 308 E. High Street, Suite 204 Jefferson City, MO 65101 david.woodsmall@woodsmalllaw.com

Missouri Division of Energy

Michael B Lanahan 301 W. High Street Jefferson City, MO 65102 mlanahan.DEenergycases@ded.mo.gov

Missouri Industrial Energy Consumers (MIEC)

Edward F Downey 221 Bolivar Street, Suite 101 efdowney@bryancave.com

Missouri Industrial Energy Consumers (MIEC)

Lewis Mills 221 Bolivar Street, Suite 101 Jefferson City, MO 65101-1574 lewis.mills@bryancave.com

Missouri Industrial Energy Consumers (MIEC)

Diana M Vuylsteke 211 N. Broadway, Suite 3600 St. Louis, MO 63102 dmvuylsteke@bryancave.com

Missouri Joint Municipal Electric Utility Commission

Terry M Jarrett 514 E. High Street, Suite 22 Jefferson City, MO 65101 terry@healylawoffices.com

Missouri Joint Municipal Electric Utility Commission

Heather H Starnes 12 Perdido Circle Little Rock, AR 72211 heather@healylawoffices.com

Missouri Joint Municipal Electric Utility Commission

Peggy A Whipple 514 E. High Street, Suite A Jefferson City, MO 65101 peggy@healylawoffices.com

Missouri Public Service Commission

Kevin Thompson 200 Madison Street, Suite 800 P.O. Box 360 Jefferson City, MO 65102 kevin.thompson@psc.mo.gov

Natural Resources Defense Council

Henry B Robertson 319 N. Fourth St., Suite 800 St. Louis, MO 63102 hrobertson@greatriverslaw.org

Renew Missouri

James M Owen 409 Vandiver Drive Building 5, Suite 205 Columbia, MO 65202 james@renewmo.org

Sierra Club

Henry B Robertson 319 N. Fourth St., Suite 800 St. Louis, MO 63102 hrobertson@greatriverslaw.org

Westar Energy, Inc.

Martin Bregman 311 Parker Circle Lawrence, KS 66049 mjb@mjbregmanlaw.com

Federal Executive Agencies

Andrew J. Unsicker Lanny L. Zieman Natalie A. Cepak Ryan K. Moore Thomas A. Jernigan Ebony M. Payton AFLOA/JACE-ULFSC 139 Barnes Drive, Suite 1 Tyndall Air Force Base, Florida 32403 (850) 283-6347 Andrew.Unsicker@us.af.mil Lanny.Zieman, 1@us.af.mil Natalie.Cepak.2@us.af.mil Ryan.Moore.5@us.af.mil Thomas.Jernigan.1@us.af.mil Ebony.Payton.ctr@us.af.mil ULFSC.Tyndall@us.af.mil

RYAN K. MOORE, FEA Paralegal