

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In The Matter of the Application of Kansas City )  
Power & Light Company for Permission and )  
Approval and a Certificate of Convenience and ) EA-2018-0021  
Necessity to Construct, Install, Own, Operate, )  
Maintain, and Otherwise Control and Manage an )  
Electric Utility System to Provide Electric Service )  
in Johnson and Pettis Counties, Missouri as an )  
Expansion of its Existing Certificated Area )

**APPLICATION OF KCP&L GREATER MISSOURI OPERATIONS COMPANY  
FOR LEAVE TO INTERVENE**

Pursuant to 4 CSR 240-2.075(10). KCP&L Greater Missouri Operations Company (“GMO”) seeks to intervene in the above-captioned docket. In support of this Application, GMO states:

1. GMO is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. GMO is primarily engaged in the business of providing electric and steam utility service in Missouri to the public in its certificated areas. GMO is an electrical corporation and public utility as defined in Section 386.020 (2000), as amended. *Id.* A Certificate of Authority for a foreign corporation to do business in the State of Missouri, evidencing the GMO’s authority under the law to conduct business in the State of Missouri, was filed with the Commission in Case No. EU-2002-1053 and is incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G). GMO’s fictitious name registration was filed in Case No. EN-2009-0015 and is incorporated herein by reference.

2. GMO holds Certificates of Convenience and Necessity from the Commission to transact business as an electric public utility in certain areas of the State of Missouri and is principally engaged in the generation, transmission, distribution and sale of electric power and energy. GMO has no pending action or final unsatisfied judgments or decisions against it from

any state or federal agency or court that involve customer service or rates, which has occurred within three years of the date of this Application other than the following pending action: *James Dickson and Angela Dickson v. KCP&L Greater Missouri Operations Company*, Case No. EC-2016-0230. In addition, no annual report or assessment fees are overdue.

3. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Lois J. Liechti  
Director, Regulatory Affairs  
Kansas City Power & Light Company  
1200 Main Street, 19<sup>th</sup> Floor  
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4. GMO accepts the record and procedural schedule established in this docket.
5. GMO seeks party status so that it can participate in KCP&L's application for a Certificate of Convenience and Necessity("CCN") in Johnson County, Missouri.
6. GMO also holds a CCN for the area in Johnson county which KCP&L is seeking a CCN.
7. GMO does not serve any customers in this area and believes it is in the best interest of both companies that KCP&L continue to serve these customers.

8. GMO intends to surrender its CCN for those areas where KCP&L will receive a CCN. Therefore, good cause exists for the granting of GMO's application.

9. Staff and OPC, through counsel, have indicated that they do not oppose the intervention of GMO in this docket in order to resolve the overlapping Johnson county CCN issue.

WHEREFORE, GMO respectfully request that the Commission issue an order authorizing them to intervene in the above-captioned matter.

Respectfully submitted,

*/s/ Roger W. Steiner*

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**Counsel for KCP&L Greater Missouri  
Operations Company**

### **CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first class United States Mail, postage pre-paid, to counsel for all parties of record this 25<sup>th</sup> day of October, 2017.

*/s/ Roger W. Steiner*

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Roger W. Steiner