

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

In the Matter of the Application of KCP&L	)	
Greater Missouri Operations Company	)	<b><u>Case No. ER-2010-0356</u></b>
For Approval to Make Certain Changes in its	)	Tariff No. JE-2010-0693
Charges for Electric Service	)	

**APPLICATION TO INTERVENE**

COMES NOW the City of St. Joseph, Missouri (hereinafter referred to as "St. Joseph"), by and through counsel, and files its Application to Intervene in this case pursuant to Section 386.420 RSMo and 4 CSR 240-2.075. In support of this application, St. Joseph states as follows:

1. The City of St. Joseph, Missouri is a municipality of the State of Missouri. The principal place of business address for the City of St. Joseph is: City Hall, 1100 Frederick Avenue, St. Joseph, Missouri 64501.
2. All communications and pleadings in this case should be served on:

Lisa Robertson  
City Attorney  
City Hall, Room 307  
1100 Frederick Avenue  
St. Joseph, MO 64501  
Phone: 816-271-4680  
Facsimile: 816-271-4683  
E-mail: lrobertson@ci.st-joseph.mo.us

and

William D. Steinmeier  
WILLIAM D. STEINMEIER, P.C.  
2031 Tower Drive, P.O. Box 104595  
Jefferson City, MO 65110-4595  
Phone: 573-659-8672  
Facsimile: 573-636-2305  
Email: wds@wdspc.com

3. On June 4, 2010, KCP&L Greater Missouri Operations Company (“GMO”) filed proposed tariff sheets with the Missouri Public Service Commission designed to implement a general rate increase for retail electric service provided by GMO in its L&P and MPS service territories in Missouri. On June 11, 2010, the Commission issued its *Order Directing Filing and Directing Notice* in this case, directing that interested parties wishing to intervene must do so on or before July 1, 2010. This Application to Intervene is, therefore, timely filed.
4. Pursuant to 4 CSR 240-2.075 (4) (A), St. Joseph states that it is a large consumer of energy supplied by GMO. As such, St. Joseph has an interest in this matter which is different from that of the general public and which may be adversely affected by a final order arising from this case. St. Joseph desires to participate fully in this proceeding.
5. Pursuant to 4 CSR 240-2.075 (4) (B), St. Joseph states that, as a governmental body representing the residents and commercial interests of the City of St. Joseph, St. Joseph is also interested in the impact of any decisions in this proceeding on behalf of those residents and businesses. Therefore, granting the instant Application to Intervene would serve the public interest.
6. Pursuant to 4 CSR 240-2.075 (2), St. Joseph states that it is currently unsure of the position(s) it will take in this matter.

WHEREFORE, the City of St. Joseph, Missouri, respectfully requests that the Missouri Public Service Commission grant this Application to Intervene in this matter and make St. Joseph a party to this proceeding for all purposes.

Respectfully submitted,

**/s/ William D. Steinmeier**

William D. Steinmeier, MoBar #25689

WILLIAM D. STEINMEIER, P.C.

2031 Tower Drive

P.O. Box 104595

Jefferson City, MO 65110-4595

Phone: 573-659-8672

Fax: 573-636-2305

Email: wds@wdspsc.com

COUNSEL FOR THE CITY OF ST.  
JOSEPH, MISSOURI

## CERTIFICATE OF SERVICE

I hereby certify that the undersigned has caused a complete copy of the attached document to be electronically filed and served on the Commission's Office of General Counsel (at [gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov)), the Office of Public Counsel (at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)), counsel for GMO (at [bill.riggins@kcpl.com](mailto:bill.riggins@kcpl.com)) and all counsel of record on this 1<sup>st</sup> day of July 2010.

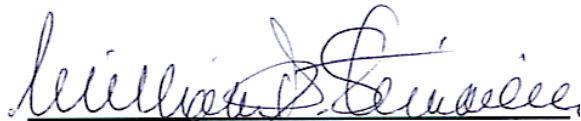
**/s/ William D. Steinmeier**

William D. Steinmeier

**ATTORNEY VERIFICATION**

STATE OF MISSOURI    )  
                                  ) ss.  
COUNTY OF COLE     )

I, William D. Steinmeier, being first duly sworn, do hereby certify, depose and state that I am the regulatory attorney for the City of St. Joseph, Missouri, which seeks to intervene in the above-styled matter pending before the Missouri Public Service Commission; that I have read the above and foregoing Application to Intervene and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing Application to Intervene by the City of St. Joseph, Missouri.

  
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William D. Steinmeier

Subscribed and sworn to before me this 1<sup>st</sup> day of July 2010.

Seal:

LAUREN EICHELBERGER  
Notary Public - Notary Seal  
STATE OF MISSOURI  
County of Cole  
My Commission Expires 12/28/2010  
Commission # 06989012

  
\_\_\_\_\_  
Notary Public