

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

In the Matter of the Union Electric Company)
d/b/a Ameren Missouri's 3rd Filing to Implement)
Regulatory Changes in Furtherance of Energy) File No. EO-2018-0211
Efficiency as Allowed by MEEIA)

**APPLICATION OF KANSAS CITY POWER & LIGHT COMPANY AND
KCP&L GREATER MISSOURI OPERATIONS COMPANY
FOR LEAVE TO INTERVENE**

Pursuant to 4 CSR 240-2.075(10), Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) seek to intervene in the above-captioned docket. In support of their Application, KCP&L and GMO state as follows:

1. KCP&L is a Missouri corporation with its principal office and place of business at 1200 Main, Kansas City, Missouri 64105. KCP&L is primarily engaged in the generation, transmission, distribution, and sale of electricity in western Missouri and eastern Kansas, operating primarily in the Kansas City metropolitan area. KCP&L is an “electrical corporation” and “public utility” as those terms are defined in Mo. Rev. Stat. §386.020 (2000) and, as such, is subject to the jurisdiction of the Commission as provided by law. KCP&L provided its Certificate of Good Standing in Case No. EF-2017-0242, which is incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G).

2. 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.

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

Tim M. Rush
Director, Regulatory Affairs
Kansas City Power & Light Company
1200 Main Street, 19th Floor
Kansas City, Missouri 64105
Phone: (816) 556-2334
Fax: (816) 556-2110
E-mail: Tim.Rush@kcpl.com

Lois J. Liechti
Director, Regulatory Affairs
Kansas City Power & Light Company
1200 Main Street, 19th Floor
Kansas City, Missouri 64105
Phone: (816) 556-2612
Fax: (816) 556-2110
E-mail: Lois.Liechti@kcpl.com

Anthony R. Westenkirchner
Senior Paralegal, Regulatory Affairs
Kansas City Power & Light Company
1200 Main Street
Kansas City, Missouri 64105
Phone: (816) 556-2668
Fax: (816) 556-2110
E-mail: anthony.westenkirchner@kcpl.com

4. KCP&L and GMO seek party status so that they can participate in Ameren Missouri's ("Ameren") application for approval of its Demand-Side Investment Mechanism and a Demand-Side Management Portfolio and Plan ("Application"). Both KCP&L and GMO generally support Ameren Missouri's application.

5. KCP&L's and GMO's interests are different than those of the general public, as illustrated by the fact that both KCP&L and GMO have forthcoming MEEIA applications.¹ Allowing KCP&L and GMO to participate will assist in creating the record for a Commission decision in this case.

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

Respectfully submitted,

/s/ Roger W. Steiner

Robert J. Hack, MBN 36496
Phone: (816) 556-2791
E-mail: rob.hack@kcpl.com
Roger W. Steiner, MBN 39586
Phone: (816) 556-2314
E-mail: roger.steiner@kcpl.com
Kansas City Power & Light Company
1200 Main – 16th Floor
Kansas City, Missouri 64105
Fax: (816) 556-2787

**Counsel for Kansas City Power & Light
Company and 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 15th day of June, 2018.

/s/ Roger W. Steiner

Roger W. Steiner

¹ See, KCP&L's and GMO's Notices of Intended Case Filing, Docket Nos. EO-2018-0298 and EO-2018-0290, respectively, both filed April 20, 2018.