

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

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri) Docket No. ET-2016-0246
for Approval of a Tariff Setting a Rate for)
Electric Vehicle Charging Stations)

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

Pursuant to 4 CSR 240-2.075 and the order issued by the Missouri Public Service Commission (“Commission”) on August 15, 2016 in the above-captioned proceeding, Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) collectively referred to as (“the Company”) hereby apply to intervene and to become parties to the above-captioned case. In support thereof, the Company states as follows:

1. KCP&L is a Missouri corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. KCP&L is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of eastern Kansas and western Missouri. KCP&L is an electrical corporation and public utility as defined in Section 386.020, Mo. Rev. Stat. (2000), as amended.¹ KCP&L provided its Certificate of Good Standing in Case No. EF-2002-315 which is incorporated herein by reference.

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 Company’s authority under the law to conduct business in the State of

¹ All statutory references are to the Missouri Revised Statutes (2000), as amended to date.

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. KCP&L 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. KCP&L has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court that involves customer service or rates, which has occurred within three years of the date of this Application. No annual report or assessment fees are overdue.

4. 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: *Ag Processing, Inc. a Cooperative v. KCP&L Greater Missouri Operations Company*, Case No. HC-2012-0259. In addition, no annual report or assessment fees are overdue.

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

Tim Rush
Director- Regulatory Affairs
Kansas City Power & Light Company
1200 Main Street, 19th Floor
Kansas City, Missouri 64105
Phone: (816) 556-2344
Fax: (816) 556-2110
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6. As an electric utility, the Company's interests differ from those of the general public. Although the Company does not currently know what position it will take in this case, its interests will be directly affected and could be adversely affected by a final order issued in this case. As the Commission is aware, KCP&L and GMO have constructed electric vehicle charging stations in its service territory. The Applicant has filed an electric vehicle charging station tariff in its current rate case (Docket No. ER-2016-0285). The Company should therefore be allowed to fully participate in this case so that it can protect its interests. In addition, allowing the Company to participate as an intervenor serves the public interest because it will afford the Company an opportunity to provide useful and relevant information that may aid the Commission in its deliberations.

7. The intervention deadline in this matter was scheduled for August 31, 2016. As such, this intervention is 58 days out of time. KCP&L was not aware that electric vehicle policy issues (Commission jurisdiction, resale of electricity) would be raised in this proceeding until the Commission's discussion at its October 26, 2016 agenda session. As a result of the discussion among the Commissioners during that agenda session, it became clear that the Company's participation in this proceeding is warranted. The Company filed its application to intervene as soon as practicable after the agenda discussion.

8. The Company's intervention will serve the public interest by assisting the Commission's record for decision. The Company will accept the record as it currently stands in this case.

WHEREFORE, the Company prays: (a) that it be permitted to intervene herein and be made a party hereto with all rights to have notice of and participate in hearings to present evidence, cross-examine witnesses, file briefs and participate in argument, should any be had; and (b) for any other appropriate relief.

Respectfully submitted,

/s/ Roger W. Steiner

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, to all counsel of record in this case this 28th day of October, 2016.

/s/ Roger W. Steiner

Roger W. Steiner