BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| Joint Application of Kansas City Power & Light |) | |
|---|---|-----------------------|
| Company, KCP&L Greater Missouri Operations |) | |
| Company and The Empire District Electric |) | |
| Company for Authority to Enter Into Certain |) | Case No. EO-2012-0015 |
| Leases and Agreements Regarding Existing |) | |
| Common Facilities at the Iatan Generating Station |) | |

APPLICATION TO INTERVENE OF THE MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION

COMES NOW, the Missouri Joint Municipal Electric Utility Commission

("MJMEUC"), pursuant to Missouri Public Service Commission ("Commission") rule 4 CSR 240-2.075, and files its Application to Intervene in the referenced case. In support thereof, MJMEUC states as follows:

- On March 9, 2012 Kansas City Power & Light filed an application requesting permission to enter into leases regarding the common facilities at the Iatan Generating Station with MJMEUC and KEPCo.
- 2. On March 14, 2012 the Commission established a deadline for interventions by April 9, 2012.
- 3. The MJMEUC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 et seq.
 RSMo., with authority to exercise public powers of a political subdivision of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MJMEUC.

- 4. MJMEUC owns a minority interest in the Iatan 2 plant, and has a material subject interest in this proceeding.
- 5. MJMEUC's position is unique among the parties currently in this case, and the interest of MJMEUC is not represented by any other party.
- 6. Communications in regard to this Application should be addressed to:

Douglas L. Healy Healy & Healy, LLC 939 Boonville, Suite A Springfield, MO 65802 doug@healylawoffices.com

WHEREFORE, MJMEUC prays that this Commission issue an order granting its application to intervene in this proceeding and for such other orders and relief as may be appropriate in the circumstances.

Respectfully Submitted,

By: _/s/ Douglas L. Healy
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ATTORNEY FOR MJMEUC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing application to intervene was served by emailing a copy to all parties on the Commission's Service List this 28th day of March, 2012.

__/s/ Douglas L. Healy_____ DOUGLAS L. HEALY