

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

In the Matter of Laclede Gas Company d/b/a Missouri)
Gas Energy's Request to Increase Its Revenues for) File No. GR-2017-0216
Gas Service)

**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 and the order issued by the Missouri Public Service Commission (“Commission”) on April 20, 2017 in the above-captioned proceeding, Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively “KCP&L/GMO”) hereby apply to intervene and to become parties to the above-captioned case. In support thereof, KCP&L/GMO state 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 GMO’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 other than the following pending actions: *Office of the Public Counsel v. Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company*, Case No. EC-2017-0175. 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: *The Staff of the Missouri Public Service Commission v. KCP&L Greater Missouri Operations Company*, Case No. EC-2016-0012; *James Dickson and Angela Dickson v. KCP&L Greater Missouri Operations Company*, Case No. EC-2016-0230; *Office of the Public Counsel v. Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company*, Case No. EC-2017-0175. 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:

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6. As electric utilities with service territories overlapping the service territory of Missouri Gas Energy (“MGE”), KCP&L and GMO compete with MGE in the provision of energy-related services and, therefore, KCP&L and GMO’s interests differ from those of the general public. The outcome of issues in this case may have an impact on similar issues that arise in future cases of KCP&L/GMO, including future rate cases. Although KCP&L/GMO do not currently know what position they will take in this case, their interests could be adversely affected by a final order issued in this case. No other party has the same interests as KCP&L/GMO and KCP&L/GMO should therefore be allowed to fully participate in this case so

that they can protect their interests. In addition, allowing KCP&L/GMO to participate as an intervenor serves the public interest because it will afford KCP&L/GMO an opportunity to provide useful and relevant information that may aid the Commission in its deliberations.

WHEREFORE, 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

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**Attorneys for Kansas City Power & Light
Company and KCP&L Greater Missouri
Operations Company**

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 1st day of May, 2017.

/s/ Roger W. Steiner

Roger W. Steiner