

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

In the Matter of the Application of Union     )  
Electric Company d/b/a Ameren Missouri     )  
For Approval of 2017 Green Tariff             )

File No. ET-2018-0063

**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” collectively, the “Company”) seek to intervene in the above-captioned docket. In support of this Application, the Company states:

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:

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4. The Company seeks party status so that it can participate in Ameren Missouri's application for approval of its Renewable Choice Program ("Application"). The Company generally supports Ameren Missouri's application.

5. Like Ameren, both KCP&L and GMO have customers that have expressed interest in renewable energy to help meet their customer-specific sustainability goals. Therefore,

the Company's interest in this proceeding is different from that of the general public. The Company's ability to offer a green tariff may be adversely affected by an order in this case. In addition, allowing the Company to participate will assist in creating the record for a Commission decision in this case.

WHEREFORE, The Company respectfully request that the Commission issue an order authorizing it to intervene in the above-captioned matter.

Respectfully submitted,

*/s/ Roger W. Steiner*

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**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 11<sup>th</sup> day of December, 2017.

*/s/ Roger W. Steiner*

Roger W. Steiner