

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

In the Matter of Kansas City Power & Light Company's)
Request for Authority to Implement a General Rate) Case No. ER-2018-0145
Increase for Electric Service)

In the Matter of KCP&L Greater Missouri Operations)
Company's Request for Authority to Implement a) Case No. ER-2018-0146
General Rate Increase for Electric Service)

APPLICATION TO INTERVENE OUT OF TIME
BY THE MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION

The Missouri Joint Municipal Electric Utility Commission (MJMEUC) hereby respectfully moves this Commission, pursuant to Rule 4 CSR 240-2.075, for an Order granting its intervention as a party in these two cases. In support of this application and motion, MJMEUC states as follows:

1. The MJMEUC is a body corporate and politic of the State of Missouri, organized as a joint municipal electric utility commission pursuant to §393.700 et seq. Revised Statutes of Missouri, 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. Sixty-eight Missouri municipalities are current parties to the joint contract establishing the MJMEUC.

2. Correspondence, communications, orders and the decision in these two cases should be addressed to:

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3. MJMEUC serves five municipalities that currently have wholesale power contracts with Kansas City Power & Light Greater Missouri Operations (KCP&L-GMO) and seven municipalities directly imbedded in KCP&L-GMO's transmission system that take transmission through the Southwest Power Pool (SPP).

4. MJMEUC is one of five owners, along with Kansas City Power and Light Company (KCP&L) and KCP&L-GMO, of the Iatan 2 Generating Plant ("Iatan 2") located at the Iatan Generating Station in Platte County, Missouri. Iatan 2 is an 850 MW super-critical, coal-fired power plant with state-of-the-art environmental controls. Iatan 2 became operational on December 31, 2010. The owners and ownership shares of Iatan 2 are as follows:

- a. KCP&L: 54.71%
- b. KCP&L-GMO: 18.00%
- c. Empire District Electric Company (Empire): 17.00%
- d. MJMEUC: 11.76%
- e. Kansas Electric Power Cooperative (KEPCo): 3.53%

5. MJMEUC is one of the six current owners of the Dogwood Energy Facility located in Pleasant Hill, Cass County, Missouri. Dogwood is a natural gas combined cycle generating plant with a capacity of 650 MW. Dogwood commenced operations in 2001 and is within the service territory of KCP&L-GMO.

6. MJMEUC has an interest that is different from that of the general public, in that it represents the interest of municipal electrical systems throughout the state, as well as municipal electric systems directly imbedded in KCP&L-GMO's transmission system that take transmission through SPP and municipal electrical systems that have wholesale power contracts

with KCP&L-GMO. MJMEUC also has interests in the Iatan-2 and Dogwood generating plants. MJMEUC and its members have direct and immediate interests in these proceedings that are not currently represented in this matter. MJMEUC recently became aware that there may be an issue that could adversely affect the Dogwood plant which is both a KCP&L-GMO customer and supplier of wholesale power, and thus good cause exists for granting MJMEUC's intervention in these two cases.

7. MJMEUC's intervention and participation in these two cases will serve the public interest by clarifying the issues under consideration, ensuring completeness of the record, and assisting the Commission in its decision-making in these cases, and MJMEUC thus requests to become a party to these cases for all purposes.

8. The Commission is authorized by 4 CSR 240-2.075(10) to grant MJMEUC's Application even though it has been filed after the February 20, 2018 intervention date.

9. MJMEUC hereby affirmatively accepts the record established in these cases, including the requirements of any orders of the Commission, as of the date of the filing of this Application.

10. No party to these cases will be adversely impacted or prejudiced by granting MJMEUC's Application to intervene.

WHEREFORE, MJMEUC respectfully requests that the Commission grant its Application to Intervene on its behalf and on behalf of its members, entitling it to fully participate in these two cases.

Respectfully submitted,

HEALY LAW OFFICES, LLC

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Dated: May 22, 2018

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for these cases on this 22nd day of May, 2018.

/s/ Peggy A. Whipple
Peggy A. Whipple