

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

In the Matter of the Application of)
Great Plains Energy Incorporated for Approval) File No. EM-2018-0012
of its Merger with Westar Energy, Inc.)

APPLICATION TO INTERVENE
BY THE MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY
COMMISSION

COMES NOW the Missouri Joint Municipal Electric Utility Commission (“MJMEUC”), pursuant to Commission Rule 4 CSR 240-2.075 and this Commission’s September 6, 2017 Order Directing Notice and Setting Intervention Date and Procedural Conference, and respectfully moves and applies for intervention as a party in this matter. In support of this motion and application, MJMEUC states as follows:

1. On August 31, 2017, Great Plains Energy Incorporated (“GPE”), Kansas City Power & Light Company (“KCP&L”), KCP&L Greater Missouri Operations Company (“GMO”) and Westar Energy, Inc. (“Westar”) applied for this Commission’s approval of their merger.

2. On September 6, 2017 this Commission ordered that “any proper person or entity wishing to intervene in this matter shall file an application to intervene no later than September 27, 2017.”

3. MJMEUC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to Revised Statutes of Missouri §393.700 *et seq.*, 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.

4. MJMEUC has an interest that is different from that of the general public, in that it represents the interests of municipal electrical systems throughout the state, as well as municipal electric systems directly imbedded in GMO's transmission system that take transmission through the Southwest Power Pool ("SPP") and municipal electrical systems that have wholesale power contracts with GMO. MJMEUC also has interests in the Iatan-2 Generating Plant co-owned with KCP&L and GMO and others. MJMEUC and its members thus have direct and immediate interests in this proceeding that are not currently represented in this matter and which may be adversely affected by a final Order arising from this case.

5. The following MJMEUC municipal members take or have the ability to take energy and/or services from or through KCP&L or GMO facilities: Carrollton, Harrisonville, Higginsville, Marshall, Odessa, Osceola, Rich Hill, Salisbury and Slater.

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

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

7. MJMEUC is a member of and participates in SPP. By virtue of the participation in SPP by Westar and by KCP&L, SPP operations extend into Kansas and Missouri and are significantly affected by Westar and KCP&L.

8. MJMEUC's intervention and participation in this proceeding would serve the public interest by clarifying the issues under consideration, ensuring completeness of the record, and assisting the Commission in its decision-making in this case.

9. MJMEUC's support of or opposition to the application for merger has not yet been determined.

10. Correspondence, communications, orders and the decision in this matter should be addressed to:

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WHEREFORE, MJMEUC respectfully requests, on behalf of itself and its members, that the Commission grant its Motion and Application to Intervene and entitle it to fully participate in this matter.

Respectfully submitted,

By: /s/ Peggy A. Whipple
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via electronic mail, this 22nd day of September, 2017, addressed to:

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