

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

In the Matter of The Empire District Electric Company's	)	
Notice of Intent to File an Application Concerning	)	File No. EO-2014-0030
Demand-Side Programs and Demand-Side Program	)	
Investment Mechanism	)	

**APPLICATION TO INTERVENE OF KANSAS CITY POWER & LIGHT COMPANY  
AND KCP&L GREATER MISSOURI OPERATIONS COMPANY**

COMES NOW Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO") (collectively, the "Companies"), pursuant to 4 CSR 240-2.075 and hereby apply to intervene and to become parties to the above-captioned case. In support thereof, the Companies state as follows:

1. KCP&L is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 1200 Main Street, Kansas City, Missouri 64105. KCP&L is engaged in the generation, transmission, distribution, and sale of electric energy and power in those areas in Missouri certificated to it by the Missouri Public Service Commission (hereinafter "Commission"), including the City of Kansas City, Missouri, as well as in areas of eastern Kansas. KCP&L's Certificate of Good Standing was filed with the Commission in Case No. EF-2010-0178 and is incorporated herein by reference.

2. GMO is a Delaware corporation with its principal office and place of business also at 1200 Main, Kansas City, Missouri 64105. GMO is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in those portions of northwestern Missouri certificated to it by the Commission. GMO provided its Certificate of Good Standing and its certificate authorizing it to do business in Missouri as a foreign corporation in Case No. EN-2009-0164 which is incorporated herein by reference.

3. The Companies are “electrical corporations” and “public utilities” as those terms are defined in Mo. Rev. Stat. § 386.020 (2000), and as such, are subject to the jurisdiction of the Commission as provided by law.

4. The Companies have a direct and pecuniary interest in this proceeding that is different from the general public. As indicated in its Notice of Intended Case Filing in File No. EO-2014-0095, KCP&L anticipates filing its application concerning demand-side programs and a Demand-Side Programs Investment Mechanism before year end. GMO has demand-side programs and a Demand-Side Investment Mechanism in place stemming from its application in Case No. EO-2012-0009.

5. Because both Companies have or will have demand-side programs and a Demand-Side Investment Mechanism, the Companies’ interest in this proceeding is different from that of the general public and cannot be represented by any other party to these proceedings. Actions taken by the Commission in this proceeding may substantially affect the Companies’ legal interests.

6. The Companies’ participation will aid the Commission in resolving the issues raised in this proceeding. Consequently, the Companies’ intervention and participation will promote the public interest.

7. In addition to undersigned counsel, pleadings notices and other correspondence concerning this matter should be addressed to:

Tim M. Rush  
Director, Regulatory Affairs  
Kansas City Power & Light Company  
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Telephone: (816) 556-2344  
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E-Mail: [Tim.Rush@kcpl.com](mailto:Tim.Rush@kcpl.com)

WHEREFORE, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company 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 parties of record this 19<sup>th</sup> day of November, 2013.

/s/ Roger W. Steiner

Roger W. Steiner