

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

In the Matter of the Joint Application of Entergy Arkansas, Inc.,)
Mid South TransCo LLC, Transmission Company Arkansas,)
LLC and ITC Midsouth LLC for Approval of Transfer of Assets) Case No. EO-2013-0396
and Certificate of Convenience and Necessity, and Merger and,)
in connection therewith, Certain Other Related Transactions.)

**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 February 15, 2013 in the above-captioned proceeding, Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“KCP&L-GMO”) (collectively, the “Companies”) 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 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 Company’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: *Emma J. McFarlin and Rebecca Shepherd v. Kansas City Power & Light Company*, Case No. EC-2013-0024; *Earth Island Institute d/b/a Renew Missouri, et al. v. Kansas City Power & Light Company*, Case No. EC-2013-0379. 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 actions: *Ag Processing, Inc. a Cooperative v. KCP&L Greater Missouri Operations Company*, Case No. HC-2012-0259; *Earth Island Institute d/b/a Renew Missouri, et al. v. KCP&L Greater Missouri Operations Company*, Case No. EC-2013-0380; *Michael P. Lehman v. KCP&L Greater Missouri Operations Company*, Case No. EC-2013-0386. 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:

Tim Rush
Director-Regulatory Affairs
Kansas City Power & Light Company
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Phone: (816) 556-2344
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6. As electric utilities, KCP&L's and GMO's interests differ from those of the general public for the following reasons. First, the asset transfer requested in this case is merely one piece of the much larger "Transaction", defined in paragraph 1 of the Joint Application, that would result in the integration of all of Entergy Corporation's transmission facilities into the Midwest Independent Transmission System Operator, Inc. ("MISO") regional transmission organization which is expected to impact transmission service for KCP&L and GMO customers. This integration ultimately would lead to the inclusion of Entergy Corporation's load and generation assets in the MISO markets which is anticipated to increase congestion along the seam between MISO and Southwest Power Pool, Inc. ("SPP") that runs right through the heart of Missouri. The Companies are both network integration transmission service customers and transmission owning members of SPP. Second, some of the Missouri facilities that Entergy Arkansas, Inc. proposes to transfer to ITC Midsouth LLC (listed in Appendix 4 to the Joint Application) are used in providing transmission service from the Crossroads Energy Center (which is physically located in Entergy's service territory) to GMO service territory. It is anticipated that, as a result of the Transaction described in the Joint Application, GMO's firm transmission fees for Crossroads delivery would immediately increase due solely to application of MISO's Schedule 7 through and out transmission service. This increase in fees is estimated to

be at least \$3.76 million per year and in all likelihood may be much greater under MISO's scheduling and congestion provisions.

7. Although the Companies do not currently know what position they will take in this case, their interests will be directly affected and could be adversely affected by a final order issued in this case. The Companies should therefore be allowed to fully participate in this case so that they can protect their interests. In addition, allowing the Companies to participate as an intervenor serves the public interest because it will afford the Companies 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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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 26th day of February, 2013.

/s/ Roger W. Steiner

Roger W. Steiner