

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's 2nd Filing to Implement) File No.: EO-2015-0055
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA)

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

COME NOW Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO") (collectively, the "Company") and pursuant to 4 CSR 240-2.075 and the December 22, 2014 order issued by the Missouri Public Service Commission ("Commission") in the above-captioned proceeding, hereby apply to intervene and to become parties in the above-captioned case. In support thereof, the Company states 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 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. KCP&L has one¹ pending action and GMO has four² pending actions against them 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. In addition no annual report or assessment fees are overdue.

4. On December 22, 2014 the Commission issued its *Order Directing Notice of Application and Establishing Intervention Filing Date*. The Commission directed any interested party to intervene in this case by January 13, 2015.

5. 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
1200 Main Street – 19th Floor
Kansas City, MO 64105
Telephone: (816) 556-2344
Facsimile: (816) 556-2110
E-Mail: Tim.Rush@kcpl.com

6. The Company currently offers Missouri Energy Efficiency Investment Act (“MEEIA”) programs pursuant to Commission orders in Case Nos. EO-2012-0008 and EO-2012-0009. The Company’s current and future MEEIA programs may be impacted by the Commission’s decision in this case. Therefore, the Company’s interest in this proceeding is different from that of the general public and allowing the Company to participate will assist in creating the record for a Commission decision in this case.

¹ *Staff of the Missouri Public Service Commission of the State of Missouri v. Kansas City Power & Light Company*, File No. EU-2015-0094.

² *AG Processing, Inc. v. KCP&L Greater Missouri Operations Company*, File No. HC-2012-0259; *R & S Home Builders, Inc., and Carol and Arvel Allman v. KCP&L Greater Missouri Operations Company*, File No. EC-2014-0343; *Danielle Mehlenbacher v. KCP&L Greater Missouri Operations Company*, File No. EC-2015-0093; *Monty Scroggins v. KCP&L Greater Missouri Operations Company*, File No. EC-2015-0155.

WHEREFORE, the Company requests the Commission approve its Application to Intervene.

Respectfully submitted,

/s/ Roger W. Steiner

Robert J. Hack, MBN 36496

Phone: (816) 556-2791

E-mail: rob.hack@kcpl.com

Roger W. Steiner, MBN 39586

Phone: (816) 556-2314

E-mail: roger.steiner@kcpl.com

Kansas City Power & Light Company

1200 Main – 16th Floor

Kansas City, Missouri 64105

Fax: (816) 556-2787

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, this 13th day of January, 2015, to all parties of record.

/s/ Roger W. Steiner

Roger W. Steiner