

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

In the Matter of Veolia Energy Kansas City, Inc.) File No. HR-2014-0066
for Authority to File Tariffs to Increase Rates) Tracking Nos. YH-2014-0240 and 0242

APPLICATION TO INTERVENE

COMES NOW the City of Kansas City, Missouri (hereinafter sometimes the "City"), pursuant to 4 CSR 240-2.075 of the Rules of Practice and Procedure, and for its Application to Intervene respectfully states:

1. The City of Kansas City, Missouri, is a municipality of the State of Missouri.
2. Correspondence, communications, orders and the decision in this matter should be

addressed to:

Theodore T. Anderson
Associate City Attorney
17th Floor City Hall
414 E. 12th St.
Kansas City, MO 64106
Telephone No.: 816/513-3114
Fax No.: 816/513-2743

Mark W. Comley
NEWMAN, COMLEY & RUTH P.C.
P.O. Box 537
Jefferson City, MO 65102-0537
Telephone No.: 573-634-2266
Fax No.: 573-636-3306

3. This case arose when Veolia Energy Kansas City, Inc. ("Veolia Energy") submitted proposed tariff sheets to the Commission which intended to implement a rate increase for steam service provided to customers in the Missouri service area of the company. On December 3, 2013 the Commission issued an Order Suspending Tariff, Scheduling Pre-hearing Conference, Directing

Notice, and Setting Deadline for Intervenors, directing that interested parties wishing to intervene must do so on or before December 24, 2013. This application is therefore timely.

4. The City has an interest in this proceeding that is different from that of the general public. The City is itself a major consumer of steam supplied by Veolia Energy. It has participated as a party in previous rate proceedings involving Veolia Energy and its predecessor, Trigen-Kansas City Energy Corporation. The City is interested in the impact of any decisions in this proceeding on behalf of itself and its residents and businesses. It desires to participate fully in this proceeding including hearing and the briefing of the issues.

5. The City asserts that its participation in this case will assist the Commission in its understanding and disposition of the issues.

6. The City has not yet adopted a position on the relief requested by Veolia Energy in this case.

WHEREFORE, for the foregoing reasons, the City of Kansas City, Missouri, respectfully requests that the Commission grant its Application to Intervene un this matter, and thereby entitle the City to have notice and to appear at the taking of testimony, to produce and cross-examine witnesses and to be heard on the arguments, and in all other respects fully participate in this proceeding.

Respectfully submitted,

/s/ Mark W. Comley

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Attorneys for City of Kansas City, Missouri

ATTORNEY VERIFICATION

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

I, Mark W. Comley, being first duly sworn, do hereby certify, depose and state that I am the attorney for The City of Kansas City, Missouri which seeks intervention in the above captioned proceeding before the Missouri Public Service Commission; that I have read the above and foregoing Application to Intervene and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing application by the above said applicant to intervene.

/s/ Mark W. Comley
Mark W. Comley

Subscribed and sworn to before me, a Notary Public, this 23rd day of December, 2013.

/s/ Annette M. Borghardt
Notary Public for Cole County, MO
M.C.E. 3/11/2014; Commission #10436657

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 23rd day of December, 2013, to:

General Counsel at staffcounsel@psc.mo.gov;
Public Counsel at opcservice@ded.mo.gov;
Diana Vuylsteke at dmvuylsteke@bryancave.com;

/s/ Mark W. Comley