

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

In the Matter of the Consideration of Adoption	)	
of the PURPA Section 111(d)(16) Integrated	)	Case No. EO-2009-0247
Resource Planning Standard as Required by	)	
Section 532 of the Energy Independence and	)	
Security Act of 2007	)	

**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 orders issued by the Missouri Public Service Commission (“Commission”) on December 17 and 22, 2008 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 located at 1201 Walnut, Kansas City, Missouri 64106. KCP&L is primarily engaged in the generation, transmission, distribution, and sale of electric energy and power in those areas in Missouri certificated to it by the Commission. KCPL's Certificate of Good Standing was filed with the Commission in Case No. EM-2000-464. That certificate is incorporated herein by reference pursuant to 4 CSR 240-2.060(G).

2. KCP&L-GMO is a Delaware corporation with its principal office and place of business also at 1201 Walnut, Kansas City, Missouri 64106. KCP&L-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. KCP&L-GMO provided its certificate authorizing it to do business in Missouri as a foreign corporation in Case No. EN-2009-0164. That certificate is incorporated herein by reference pursuant to 4 CSR 240-2.060(G).

3. KCP&L and KCP&L-GMO 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. Neither of the Companies have any pending action or final unsatisfied judgments or decisions 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. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Tim Rush  
Director- Regulatory Affairs  
Kansas City Power & Light Company  
1201 Walnut – 13<sup>th</sup> Floor  
Kansas City, Missouri 64106  
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Kansas City Power & Light Company  
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Phone: (816) 556-2483  
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5. On December 17, 2008, the Commission issued an order establishing case, providing notice, setting intervention deadlines, and scheduling a joint prehearing. As clarified by its December 22, 2008 order, the Commission directed any interested party to intervene in this case by January 16, 2009.

6. As electric utilities, KCP&L’s and KCP&L-GMO’s interests differ from those of the general public. 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 any changes to the Commission’s regulations. 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 KCP&L-GMO respectfully request that the Commission issue an order authorizing it to intervene in the above-captioned matter.

Respectfully submitted,

/s/ *Curtis D. Blanc*

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**Counsel for Kansas City Power & Light Company and  
KCP&L Greater Missouri Operations Company**

Dated: January 16, 2009

### **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 16<sup>th</sup> day of January 2009.

/s/ *Curtis D. Blanc*

Curtis D. Blanc