

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

In the Matter of the Application of Union Electric    )  
Company for Authority to Continue the                )  
Transfer of Functional Control of Its Transmission    )        Case No. EO-2008-0134  
System to the Midwest Independent Transmission    )  
System Operator, Inc.                                    )

**APPLICATION OF KANSAS CITY POWER & LIGHT COMPANY  
FOR LEAVE TO INTERVENE**

Pursuant to 4 CSR 240-2.075 and the Order Providing Notice and Establishing Intervention Deadline issued by the Missouri Public Service Commission (“Commission”) on November 6, 2007 in the above-captioned proceeding, Kansas City Power & Light Company (“KCPL”) hereby applies to intervene and to become a party to the above-captioned case. In support thereof, KCPL states as follows:

1.        KCPL is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 1201 Walnut, Kansas City, Missouri 64106. KCPL 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 (“Commission”), including the City of Kansas City, Missouri, as well as in areas of eastern Kansas.

2.        KCPL is an “electrical corporation” and “public utility” as those terms are defined in Mo. Rev. Stat. § 386.020 (2000), and as such, is subject to the jurisdiction of the Commission as provided by law. KCPL provides electric service to approximately 230,000 residential customers and approximately 30,100 commercial and industrial customers in Missouri. KCPL's Certificate of Good Standing was filed with the Commission in Case No. EM-2000-464 and is incorporated herein by reference.

3. KCPL has no pending or final judgments or decisions against it from state or federal regulatory agencies or courts which involve customer service occurring within the three (3) years immediately preceding the filing of this application, except as listed in Exhibit A. KCPL has a general rate case pending before the Commission in Case No. ER-2007-0291. KCPL is also a party to the joint application that was submitted to the Commission in Case No. EM-2007-0374, concerning the acquisition of Aquila, Inc. by KCPL's parent company, Great Plains Energy Incorporated. KCPL has no overdue Commission annual reports or assessment fees.

4. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Charles Locke  
Regulatory Affairs Department  
Kansas City Power & Light Company  
1201 Walnut – 13<sup>th</sup> Floor  
Kansas City, Missouri 64106  
Phone: (816) 556-2950  
Fax: (816) 556-2161  
E-mail: Charles.Locke@kcpl.com

Curtis Blanc  
Kansas City Power & Light Company  
1201 Walnut – 20<sup>th</sup> Floor  
Kansas City, Missouri 64141  
Phone: (816) 556-2483  
Fax: (816) 556-2787  
Email: Curtis.Blanc@kcpl.com

5. On November 1, 2007, Union Electric Company d/b/a AmerenUE (“AmerenUE”), filed an application with the Commission for authority to continue the transfer of functional control of its transmission system to the Midwest Independent Transmission System Operator, Inc. (“MISO”). The Commission issued an Order Providing Notice and Establishing Intervention Deadline on November 6, 2007, wherein, among other things, the Commission ordered that any interested party seeking to intervene do so by November 30, 2007.

6. KCPL is a member of the Southwest Power Pool, Inc. (“SPP”). A transmission seam exists between SPP and MISO that impacts KCPL's ability to sell power to and import power from areas East of SPP's footprint. As such, KCPL will be impacted by the

Commission's resolution of AmerenUE's application. Consequently, KCPL's interest in this proceeding is different from that of the general public and cannot be represented by any other party to these proceedings.

**WHEREFORE**, KCPL respectfully requests 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**

Dated: November 26, 2007

**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 26<sup>th</sup> day of November 2007, to:

Office of the Public Counsel  
Governor Office Building  
200 Madison Street, Suite 650  
Post Office Box 2230  
Jefferson City, Missouri 65102

General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

Thomas Byrne  
Managing Associate General Counsel  
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1901 Chouteau Avenue  
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Renee Parsons  
Senior Attorney  
Aquila, Inc.  
20 W. 9<sup>th</sup> Street  
Kansas City, Missouri 64105

*/s/ Curtis D. Blanc*

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Curtis D. Blanc

**Exhibit A:**

The following is a listing of Applicant's pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this application:

1. *Judy Shifrin v. Kansas City Power & Light Co.*, MPSC Case No. EC-2008-0100.
2. *Marisa Morales v. Kansas City Power & Light Co.*, MPSC Case No. EC-2008-0121.