

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

In the Matter of The Empire District Electric)
Company of Joplin, Missouri for Authority to File Tariffs) **Case No. ER-2011-0004**
Increasing Rates for Electric Service Provided to)
Customers in the Missouri Service Area of the Company)

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

COMES NOW Kansas City Power & Light Company (hereinafter "KCP&L"), pursuant to 4 CSR 240-2.075, et seq., and applies to intervene and to become a party herein. In support thereof, KCP&L states:

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 Missouri Public Service Commission (hereinafter "Commission"), including the City of Kansas City, Missouri, as well as in areas of eastern Kansas. KCP&L is an "electrical corporation" and "public utility" as those terms are defined in Section 386.020, RSMo 2000¹, and, as such, is subject to the jurisdiction of the Commission as provided by law. KCP&L's Certificate of Good Standing was filed with the Commission in Case No. EM-2000-753 and is incorporated herein by reference.

¹ All statutory references are to Revised Statutes of Missouri 2000.

2. Applicant has three pending actions² against it from any state or federal agency or court which involve customer service rates, which has occurred within three years of the date of this Application.

3. Applicant has no overdue annual report or assessment fees.

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

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² In the Matter of the Complaint Against Kansas City Power & Light Company by William Flohrs, Kansas Corporation Commission (“KCC”) Docket No. 10-KCPE-809-COM; In the Matter of the Complaint Against Kansas City Power & Light Company by C. Charles Cantor, KCC Docket No. 10-KCPE-820-COM; and In the Matter of the Complaint Against Kansas City Power & Light Company by Exclusive MD, P.A. Erica Catausan, KCC Docket No. 11-KCPE-031-COM.

5. On September 28, 2010, The Empire District Electric Company (“Empire”) submitted tariffs designed to implement a general rate increase for electric service. Empire has indicated in its direct testimony that this proceeding will include the review of capital additions and construction expenditures at the Iatan power plants located at Weston, Missouri. (Gipson Direct, p. 4)

6. On October 5, 2010, the Commission issued its Suspension Order and Notice which directed that any entity wishing to intervene in this matter should file an application to intervene not later than October 20, 2010.

7. KCP&L has an interest in this proceeding that is different from that of the general public and which may be adversely affected by a final order arising from this case. KCP&L is a joint owner with Empire in the Iatan 1 and Iatan 2 power plants. Any decisions relating to these power plants in this proceeding may directly affect the interests of KCP&L. Moreover, KCP&L’s intervention is in the public interest. KCP&L’s interest in this case arises from its status as one of only four investor-owned electric utilities regulated by the Commission in this state with a direct and specific interest in the issues raised in this case, including the Commission’s treatment of various capital expenditures, revenue and expense items. KCP&L may be able to provide the Commission the perspective of a different Missouri utility regarding the various accounting and regulatory issues raised in this case.

8. For the above-stated reasons, KCP&L's interest in this proceeding is different from that of the general public and cannot be represented by any other party to these proceedings. Actions taken by the Commission in this proceeding may substantially affect KCP&L's interests.

9. KCP&L's participation will aid the Commission in resolving the issues raised in this proceeding. Consequently, KCP&L's intervention and participation will promote the public interest.

10. Until KCP&L has had an opportunity to more fully evaluate the testimony and recommendations presented in this case, KCP&L is unable to state its position on the relief sought in this proceeding.

WHEREFORE, Kansas City Power & Light Company respectfully requests that the Commission issue an order authorizing it to intervene in the above-captioned matter.

Respectfully submitted,

/s/ Roger W. Steiner

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**ATTORNEYS FOR
KANSAS CITY POWER & LIGHT 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 parties of record this 18th day of October 2010.

/s/ Roger W. Steiner

Roger W. Steiner