

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

In the Matter of Veolia Energy Kansas City, Inc.)
For Authority to File Tariffs to Increase Rate) Case No. HR-2011-0241

**KANSAS CITY POWER & LIGHT COMPANY’S
MOTION TO INTERVENE**

Pursuant to 4 CSR 240-2.075 and the Order Setting Procedural Schedule, Notice of Hearing, and Order Directing Notice issued by the Missouri Public Service Commission (“Commission”) in the above-captioned proceeding on May 2, 2011, Kansas City Power & Light Company (“KCP&L”) hereby requests intervention to become a party herein. In support thereof, KCP&L 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 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.

2. KCP&L 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

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

(3) years immediately preceding the filing of this application. KCP&L has no overdue Commission annual reports or assessment fees.

3. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to, in addition to the undersigned Counsel:

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@KCP&L.com

4. On April 22, 2011, Veolia Energy Kansas City, Inc. (“Veolia”) submitted tariffs designed to implement a general rate increase for steam service. Veolia indicates the new steam service rates are designed to increase its gross annual steam tariff revenues by approximately \$1,379,000. The submitted tariffs carry an effective date of May 22, 2011.

5. On May 2, 2011, the Commission issued its Order Setting Procedural Schedule, Notice of Hearing, and Order Directing Notice, which directed that any entity wishing to intervene in this matter should file a motion to intervene not later than May 11, 2011.

6. KCP&L has a direct and pecuniary interest in this proceeding that is different from that of the general public. KCP&L provides electricity in the same service area for which Veolia is providing steam services. It is therefore important to KCP&L that Veolia’s rates appropriately reflect its cost of service.

7. 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 legal interests.

8. 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.

9. Since there is insufficient information currently available to identify all issues that may arise which will affect KCP&L's interests, KCP&L reserves its right to state its position and participate with regard to any matter or issue arising in this proceeding.

WHEREFORE, KCP&L respectfully requests that the Commission issue an order authorizing it to intervene in the above-captioned matter.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner MBN#39586
Corporate Counsel
Kansas City Power & Light Company
1200 Main Street, 16th Floor
Kansas City, MO 64105
Telephone: (816) 556-2314
Facsimile: (816) 556-2787
E-Mail: Roger.Steiner@kcpl.com

James M. Fischer MBN#27543
Fischer & Dority, P.C.
101 Madison, Suite 400
Telephone: (573) 636-6758
Fax: (573) 636-0383
Email: jfischerpc@aol.com

**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 11th day of May, 2011

/s/ Roger W. Steiner

Roger W. Steiner