

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

In the Matter of the Joint Application of)	
Great Plains Energy Incorporated, Kansas)	
City Power & Light Company, and Aquila,)	
Inc. for Approval of the Merger of Aquila,)	Case No. EM-2007-0374
Inc. with a Subsidiary of Great Plains)	
Energy Incorporated and for Other)	
Related Relief)	

**OBJECTION OF AQUILA, INC. TO APPLICATION
TO INTERVENE OF SOUTH HARPER RESIDENTS**

Comes now Aquila, Inc. ("Aquila") and states its opposition to the Application to Intervene of South Harper Residents. In support thereof, Aquila states the following:

1. On April 4, 2007, Great Plains Energy, Inc., Kansas City Power & Light Company ("KCPL") and Aquila filed a Joint Application for approval of a series of transactions whereby Aquila will become a direct, wholly-owned subsidiary of Great Plains Energy.

2. On April 9, 2007, the Missouri Public Service Commission ("Commission") issued an Order Directing Notice and Order Directing Filing pursuant to which the Commission established an intervention deadline of April 30, 2007.

3. On April 30, 2007, seven individuals (hereinafter the "South Harper Residents") filed an Application to Intervene as a party to the proceeding. The request of the South Harper Residents should be denied because the Application to Intervene does not state a meaningful interest in the proceeding that would permit them to become a party to the case and does not otherwise comply with the requirements or standards of the Commission governing intervention.

4. The Application to Intervene of the South Harper Residents does not comply with Commission rule 4 CSR 240-2.070. As a general matter, the South Harper Residents are not customers of either Aquila or KCPL. As such, they have no cognizable interest whatsoever in the outcome of this proceeding. Second, the stated concerns of the South Harper Residents are not relevant to the proceeding. The South Harper Residents' argument that they are parties to a pending civil court claim against Aquila is not sufficient to establish standing to intervene in this proceeding. To the contrary, they should not be allowed to intervene in this proceeding for the apparent purpose of seeking advantage in a private dispute with Aquila having no relevance whatsoever to the subject matter of this case.

5. South Harper Residents also have failed to explain how their interests in the appeal of Case No. EA-2006-0309 or the private civil actions against Aquila could be adversely impacted by an approval of the Joint Application. Similarly, the South Harper Residents have failed to show how their intervention would serve the public interest. Accordingly, their conclusory statements are not sufficient to satisfy the Commissions' rules establishing the necessity for intervention.

6. The South Harper Residents will not be prejudiced if their intervention is denied. By their own admission they participated in the EA-2006-0309 case; a proceeding dealing specifically with the South Harper power station. Also, they state they have exercised their recourse to petition the civil courts concerning alleged damages. Finally, any interests of the general public, like the South Harper Residents, are represented by the Office of the Public Counsel which is expected to be an active participant in the case.

WHEREFORE, having failed to meet the minimal requirements to justify intervention under Commission rule 4 CSR 240-2.070, the Application to Intervene of the South Harper Residents should be denied.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, electronic mail or hand delivery, on this 4th day of May, 2007, to the following:

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