

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

**In the Matter of Union Electric Company, d/b/a            )**  
**AmerenUE’s Tariffs to Increase Its Annual            )**  
**Revenues for Electric Service.                            )**   **File No. ER-2010-0036**

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

Kansas City Power & Light Company (“KCP&L”), by and through its counsel and pursuant to 4 CSR 240-2.075, applies to intervene in the above-referenced cases. In support of this Application, KCP&L states:

1. KCP&L is a Missouri corporation, in good standing in all respects, with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. KCP&L is engaged in the generation, transmission, distribution and sale of electricity in western Missouri and eastern Kansas, operating primarily in the Kansas City metropolitan area. KCP&L is an “electrical corporation: and “public utility” as those terms are defined in Section 386.020 and, as such, is subject to the jurisdiction of the Commission as provided by law. KCP&L’s Certificate of Good Standing was filed 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 (3) years immediately preceding the filing of this application.

3. KCP&L is current on its annual report and assessment fee obligations to the Commission, and no such report or assessment fee is overdue.

4. KCP&L has an interest in this case that is different from that of the general public and which may be adversely affected by a final order arising from this case. 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 revenue and expense items.

5. Communications in this matter should be addressed to:

Karl Zobrist  
Roger W. Steiner  
Sonnenschein Nath & Rosenthal LLP  
4520 Main Street, Suite 1100  
Kansas City, MO 64111  
Telephone: 816-460-2400  
Fax: 816-531-7545  
Email: [kzobrist@sonnenschein.com](mailto:kzobrist@sonnenschein.com)  
Email: [rsteiner@sonnenschein.com](mailto:rsteiner@sonnenschein.com)

Vickie Schatz  
Corporate Counsel  
Kansas City Power & Light Company  
1200 Main Street  
Kansas City, MO 64105  
Telephone: 816-556-2791  
Email: [victoria.schatz@kcpl.com](mailto:victoria.schatz@kcpl.com)

Tim Rush  
Kansas City Power & Light Company  
1200 Main Street  
Kansas City, MO 64105  
Telephone: 816-556-2791  
Email: [tim.rush@kcpl.com](mailto:tim.rush@kcpl.com)

6. In addition, KCP&L submits that its Application to Intervene meets the requirements of the good cause standard because 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.

7. Although this Application is made after the August 17, 2009 date set in the Commission's Order of July 27, 2009 for interventions, KCP&L accepts the record as it stands. The Commission's granting of this Application will not prejudice any party.

8. 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 permission to intervene out of time in the above referenced docket.

/s/ Karl Zobrist

Karl Zobrist, MO #28325  
Roger W. Steiner, MO #39586  
Sonnenschein Nath & Rosenthal LLP  
4520 Main Street, Suite 1100  
Kansas City, MO 64111  
Telephone: (816) 460-2545  
Facsimile: (816) 531-7545  
Email: [kzobrist@sonnenschein.com](mailto:kzobrist@sonnenschein.com)  
Email: [rsteiner@sonnenschein.com](mailto:rsteiner@sonnenschein.com)

Attorneys for Kansas City Power & Light Company

### **Certificate of Service**

I hereby certify that a true and correct copy of the foregoing was e-mailed on this 27th day of October, 2009, to the persons on the Commission's service list in this case.

/s/ Karl Zobrist

Attorney for Kansas City Power & Light Company