

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

In the Matter of Kansas City Power & Light)
Greater Missouri Operations Company's)
Request for Authority to Implement a) File No. ER-2016-0156
General Rate Increase for Electric Service) Tracking No. YE-2016-0223

APPLICATION TO INTERVENE OUT OF TIME

COME NOW International Brotherhood of Electrical Workers, Local Unions No. 412, 1464, and 1613, (“Locals 412, 1464, and 1613” or the “Locals”) by and through their counsel, Blake & Uhlig, P.A., and respectfully submit this Application to Intervene. In support of this Application, the Locals state as follows:

1. Locals 412, 1464 and 1613 are voluntary organizations doing business and representing employees in the State of Missouri. The Locals are also labor organizations as defined in the National Labor Relations Act, as amended, 29 U.S.C. § 152, *et seq.* The Locals have separate collective bargaining agreements with Kansas City Power & Light Company and represent certain employees of KCP&L.

2. The names, addresses and telephone numbers of the Locals seeking leave to intervene are:

Bill McDaniel, Business Manager
IBEW Local Union No. 412
6200 Connecticut, Suite 105
Kansas City, Missouri 64120
(816) 231-4530

Darrell McCubbins, Business Manager
IBEW Local Union No. 1464
P.O. Box 33443
Kansas City, Missouri 64120
(816) 231-1464

David Pinon, Business Manager
IBEW Local Union No. 1613
6900 Executive Dr., Suite 180
Kansas City, Missouri 64120
(816) 241-1613

Counsel: Michael E. Amash
Blake & Uhlig, P.A.
753 State Avenue, Suite 475
Kansas City, Kansas 66101
(913) 321-8884

3. The Locals request that service be made to the Locals' counsel.

4. The Locals represent employees who may be affected by Orders entered by the Commission in this proceeding, and, accordingly, the Locals and the employees they represent are interested parties in this proceeding. The Locals and the employees they represent have a direct interest in this proceeding which is different from that of the general public, and which interests cannot be adequately represented by any other party.

5. The Locals have no current position regarding the KCP&L's Application in this proceeding. However, to the extent that said Application may impact on the wages, benefits, and terms and conditions of employment of the employees that the Locals represent, the Locals reserve the right to participate in the proceedings to the extent necessary to protect the interests of their members.

6. The Locals seek permission to intervene in this matter pursuant to 4 CSR 240-2.075. Pursuant to 4 CSR 240-2.075(10) the Commission is authorized to grant the instant motion after the March 17, 2016, intervention date.

7. The Locals are the exclusive collective bargaining representative of certain KCP&L non-managerial employees. The Locals and the employees they represents may be affected by Orders entered by the Commission in this proceeding, and,

accordingly, are interested parties in this proceeding. The Locals and the employees they represent have a direct interest in this proceeding which is different from that of the general public, all other labor organizations, Kansas City Power & Light, or any other party. Thus, the interests of the Locals and the employees they represent cannot be adequately represented by any other party.

8. The Locals hereby affirmatively accept the record established in this case, including the requirements of any orders of the Commission, as of the date the instant Motion is filed.

9. No party to this matter will be adversely impacted or prejudiced by granting this Application to Intervene. The Locals have acted as expeditiously as possible to submit the instant Application to Intervene upon learning of the instant filing with the Commission.

WHEREFORE, having stated the grounds for intervention, their position and interest in this proceeding, the International Brotherhood of Electrical Workers, Local Unions No. 412, 1464; and 1613 hereby request that the Commission:

- A. Grant them leave to intervene in these proceedings on their behalf and on behalf of their members and to be heard at such time as the Commission may fix; and
- B. In all respects be a party to this proceeding.

Dated, this 21st day of March, 2016.

Respectfully submitted,

BLAKE & UHLIG, P.A.
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By: /s/ Michael E. Amash

ATTORNEYS FOR IBEW LOCALS 412,
1464, AND 1613

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *Application to Intervene* was served upon all parties to this action, either by email and electronically filed using EFIS, this 21st day of March, 2016.

/s/ Michael E. Amash
Attorney for IBEW 412, 1464, and 1613