

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

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

**MOTION FOR LEAVE TO APPEAR PRO HAC VICE**

COME NOW, Willie E. Shepherd, Raymond L. Gifford, Adam M. Peters and Amy M. Danneil, counsel for the City of Kansas City, Missouri, pursuant to 4 CSR 240-2.040(3)(C) and Missouri Supreme Court Rules 6.01(m) and 9.03, and for their Motion for Leave to Appear Pro Hac Vice respectfully show the Commission the following:

1. Movants are not currently admitted to practice in the State of Missouri.
2. Movant Willie E. Shepherd is a member in good standing of the Bar of the State of Colorado, the United States District Court for the District of Colorado, and the United States 10<sup>th</sup> Circuit Court of Appeals.
3. Movant Raymond L. Gifford is a member in good standing of the Bar of the State of Colorado, the United States District Court for the District of Colorado, the United States 10<sup>th</sup> Circuit Court of Appeals and the United States District of Columbia Circuit Court of Appeals.
4. Movants Adam M. Peters and Amy M. Danneil are members in good standing of the Bar of the State of Colorado.
5. Movants represent that they will abide by the Federal Rules of Civil Procedure and the governing Rules of the Missouri Public Service Commission, as well as the Rules of

Professional Conduct as set forth in Rule 4 and agree to be subject to discipline by the courts of the State of Missouri.

6. Neither Movants nor any member of Movants' firm have been disbarred or suspended by a court of record or by a state bar association, and there are no pending disciplinary proceedings against Movants.

7. Additionally, Movants are fully familiar with the facts and circumstances of this case and possess substantial knowledge concerning the business of the City of Kansas City. By reason of the attorney/client relationship Movants have with the City of Kansas City, the City of Kansas City believes Movants' participation in this case would substantially assist in this proceeding before the Commission and would serve the City of Kansas City's best interests.

8. Movants have designated attorney Mark W. Comley, of Newman, Comley & Ruth P.C., as associate counsel with authority to act as attorney of record for all purposes. Mark W. Comley is admitted to practice before and is a member in good standing of the Bar of the State of Missouri and maintains an office in the State of Missouri.

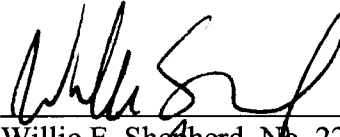
9. Movants attach their verifications to this Motion.

10. Movants attach their receipt evidencing payment of the enrollment fee required under Rule 6.01 to this Motion.

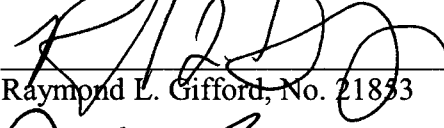
WHEREFORE, PREMISES CONSIDERED, Movants respectfully request the Commission to enter an Order granting this Motion for Leave to Appear Pro Hac Vice for the purpose of representing the City of Kansas City in the above-entitled and numbered case.

DATED this 16<sup>th</sup> day of April, 2007.

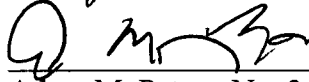
Respectfully submitted,



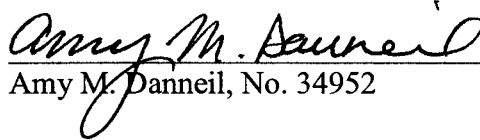
Willie E. Shepherd, No. 22679



Raymond L. Gifford, No. 21853



Adam M. Peters, No. 34099



Amy M. Danneil, No. 34952

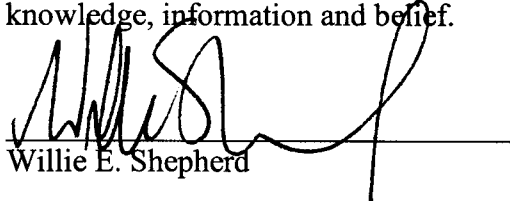
KAMLET SHEPHERD & REICHERT, LLP

1515 Arapahoe Street, Tower 1, Suite 1600  
Denver, Colorado 80202  
Phone: 303.825.4200  
Fax: 303.825.1185  
Email: [wshepherd@ksrlaw.com](mailto:wshepherd@ksrlaw.com)

**VERIFICATION**

STATE OF COLORADO     )  
  ) ss:  
COUNTY OF DENVER     )

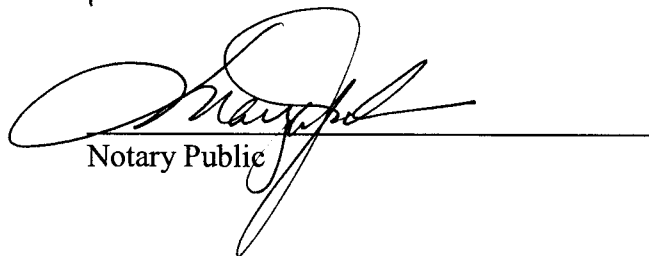
I, WILLIE E. SHEPHERD, being first duly sworn, hereby certify that I have read the foregoing **MOTION FOR LEAVE TO APPEAR PRO HAC VICE** and state that the facts alleged therein are true and correct to the best of my knowledge, information and belief.

  
Willie E. Shepherd

Subscribed and sworn to before me this 16<sup>th</sup> day of April, 2007, by WILLIE E. SHEPHERD.

Witness my hand and official seal.

My Commission Expires: 5/6/2010.

  
Notary Public

[SEAL]

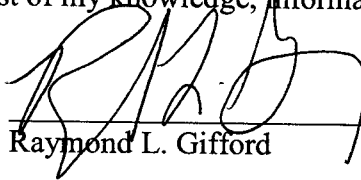
**MARY A. JOHNSON  
NOTARY PUBLIC  
STATE OF COLORADO**

**MY COMMISSION EXPIRES 05/06/2010**

**VERIFICATION**

STATE OF COLORADO     )  
  ) ss:  
COUNTY OF DENVER     )

I, RAYMOND L. GIFFORD, being first duly sworn, hereby certify that I have read the foregoing **MOTION FOR LEAVE TO APPEAR PRO HAC VICE** and state that the facts alleged therein are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Raymond L. Gifford

Subscribed and sworn to before me this 16 day of April, 2007, by RAYMOND L. GIFFORD.

Witness my hand and official seal.

My Commission Expires: 5/6/2010.

  
\_\_\_\_\_  
Notary Public

[SEAL]

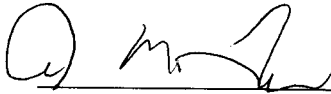
MARY A. JOHNSON  
NOTARY PUBLIC  
STATE OF COLORADO

MY COMMISSION EXPIRES 05/06/2010

**VERIFICATION**

STATE OF COLORADO     )  
  ) ss:  
COUNTY OF DENVER     )

I, ADAM M. PETERS, being first duly sworn, hereby certify that I have read the foregoing **MOTION FOR LEAVE TO APPEAR PRO HAC VICE** and state that the facts alleged therein are true and correct to the best of my knowledge, information and belief.

  
Adam M. Peters

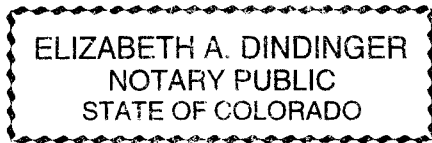
Subscribed and sworn to before me this 13<sup>th</sup> day of April, 2007, by ADAM M. PETERS.

Witness my hand and official seal.

My Commission Expires: 08/31/2009.

  
Notary Public

[SEAL]

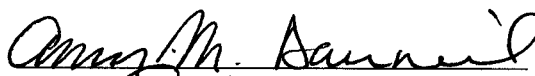


My Commission Expires 08/31/2009

**VERIFICATION**

STATE OF COLORADO     )  
  ) ss:  
COUNTY OF DENVER     )

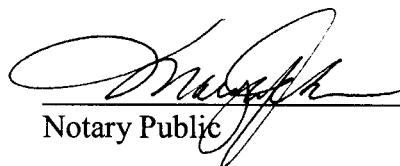
I, AMY M. DANNEIL, being first duly sworn, hereby certify that I have read the foregoing **MOTION FOR LEAVE TO APPEAR PRO HAC VICE** and state that the facts alleged therein are true and correct to the best of my knowledge, information and belief.

  
Amy M. Danneil

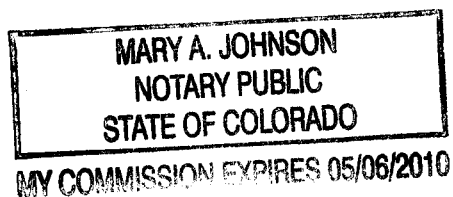
Subscribed and sworn to before me this 13 day of April, 2007, by AMY M. DANNEIL

Witness my hand and official seal.

My Commission Expires: 5/6/2010.

  
Notary Public

[SEAL]



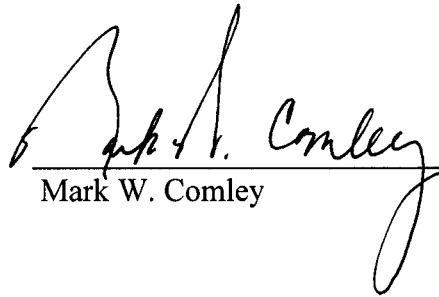
**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 18<sup>th</sup> day of April, 2007, the foregoing **MOTION FOR LEAVE TO APPEAR PRO HAC VICE** was sent via email to the following:

Office of Public Counsel at opcservice@ded.mo.gov;  
General Counsel's Office at gencounsel@psc.mo.gov;  
James C. Swearengen and Paul A. Boudreau at paulb@brydonlaw.com;  
Karl Zobrist at kzobrist@sonnenschein.com;  
James M. Fischer at jfischerpc@aol.com;  
Renee Parsons at [renee.parsons@aquila.com](mailto:renee.parsons@aquila.com);  
Stuart Conrad at [stucon@fcplaw.com](mailto:stucon@fcplaw.com);  
Union Electric Company Legal Dept. at mlyons@ameren.com;

and via U.S. Mail, postage prepaid, to:

Trigen-Kansas City Energy Corporation Legal Dept.  
115 Grand Avenue  
Kansas City, MO 64106.

  
\_\_\_\_\_  
Mark W. Comley





THOMAS F. SIMON  
CLERK

**CLERK OF THE SUPREME COURT  
STATE OF MISSOURI  
POST OFFICE BOX 150  
JEFFERSON CITY, MISSOURI  
65102**

TELEPHONE  
(573) 751-4144

April 17, 2007

This will hereby acknowledge receipt of \$400 as required by Rule 6.01(m) for Willie E. Shepherd, Raymond L. Gifford, Adam M. Peters and Amy M. Danneil appearing in In the Matter of Joint Application of Great Plains Energy Incorporated, et al., etc., Case No. EM-2007-0374 to be filed with the Missouri Public Service Commission.

A handwritten signature in black ink, appearing to read "Thomas F. Simon", with a large, stylized "P" or "S" written over the end of the name.

Thomas F. Simon, Clerk