

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

In the Matter of the Application of Union Electric     )  
Company d/b/a Ameren Missouri for Authority to     )     Case No. EO-2012-0146  
Sell and Repurchase Coal and Lease Property     )

**KANSAS CITY POWER & LIGHT COMPANY  
AND KCP&L GREATER MISSOURI OPERATIONS COMPANY  
MOTION TO INTERVENE**

Pursuant to 4 CSR 240-2.075 and the November 10, 2011 Order Directing Notice, Setting Intervention Deadline, Directing Staff Recommendation and Setting and On-the-Record Proceeding issued by the Missouri Public Service Commission ("Commission") in the above-captioned proceeding, Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Kansas City Operations Company ("GMO") hereby request intervention to become parties herein. In support thereof, KCP&L and GMO state 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 2000<sup>1</sup>, 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.

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<sup>1</sup> All statutory references are to Revised Statutes of Missouri 2000.

2. GMO is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. GMO is primarily engaged in the business of providing electric and steam utility service in Missouri to the public in its certificated areas. GMO is an “electrical corporation” and “public utility” as defined in Mo. Rev. Stat. § 386.020. *Id.* A Certificate of Authority for a foreign corporation to do business in the State of Missouri, evidencing GMO’s authority under the law to conduct business in the State of Missouri, was filed with the Commission in Case No. EU-2002-1053 and is incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G). GMO’s fictitious name registration was filed in Case No. EN-2009-0015 and is incorporated herein by reference.

3. 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 with the exception of *Briarcliff Development Company v. Kansas City Power & Light Company*, File No. EC-2011-0383. KCP&L has no overdue Commission annual reports or assessment fees.

4. GMO has no pending or final judgments or decisions against it from the state or federal regulatory agencies or courts which involve customer service occurring within the three (3) years immediately preceding the filing of this application with the exception of *Eddie Shepherd v. KCP&L Greater Missouri Operations Company*, File No. EC-2011-0373.

5. 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 – 19<sup>th</sup> Floor  
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Facsimile: (816) 556-2110

E-Mail: [Tim.Rush@KCP&L.com](mailto:Tim.Rush@KCP&L.com)

6. On November 9, 2011, Ameren Missouri submitted an application to sell coal and lease a small portion of its property at the Rush Island Power Plant as part of a program to utilize refined coal in order to lower costs and reduce emissions.

7. On November 10, 2011, the Commission issued its Order Setting an intervention deadline which directed that any entity wishing to intervene in this matter should file a motion to intervene not later than November 17, 2011.

8. KCP&L and GMO have a direct and pecuniary interest in this proceeding that is different from that of the general public because both companies are investigating refined coal technologies for their power plants.

9. For the above-stated reasons, KCP&L's and GMO'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 and GMO's legal interests.

10. KCP&L's and GMO's participation will aid the Commission in resolving the issues raised in this proceeding. Consequently, KCP&L's and GMO's intervention and participation will promote the public interest.

11. KCP&L and GMO support Ameren Missouri's application.

**WHEREFORE**, KCP&L and GMO respectfully request that the Commission issue an order authorizing them to intervene in the above-captioned matter.

Respectfully submitted,

*/s/ Roger W. Steiner*

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**ATTORNEYS FOR  
KANSAS CITY POWER & LIGHT COMPANY  
AND KCP&L GREATER MISSOURI  
OPERATIONS 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 17<sup>h</sup> day of November, 2011

*/s/ Roger W. Steiner*

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Roger W. Steiner