

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

In the Matter of the Application of Aquila, Inc. for)
Permission and Approval and a Certificate of Public)
Convenience and Necessity Authorizing it to Acquire,)
Construct, Install, Own, Operate, Maintain, and) Case No. EA-2006-0499
otherwise Control and Manage Electrical Distribution)
Substation and Related Facilities in Kansas City,)
Jackson County, Missouri (Near the City of Raymore))

**APPLICATION OF KANSAS CITY POWER & LIGHT COMPANY
FOR LEAVE TO INTERVENE**

Pursuant to 4 CSR 240-2.075 and the Order and Notice issued by the Missouri Public Service Commission (“Commission”) on June 28, 2006 in the above-captioned proceeding, Kansas City Power & Light Company (“KCPL”) hereby applies to intervene and to become a party to the above-captioned case. In support thereof, KCPL states as follows:

1. KCPL is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 1201 Walnut, Kansas City, Missouri 64106. KCPL 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 (“Commission”), including the City of Kansas City, Missouri, as well as in areas of eastern Kansas.

2. KCPL is an “electrical corporation” and “public utility” as those terms are defined in Mo. Rev. Stat. § 386.020 (2000), and as such, is subject to the jurisdiction of the Commission as provided by law. KCPL provides electric service to approximately 230,000 residential customers and approximately 30,100 commercial and industrial customers in Missouri. KCPL's

Certificate of Good Standing was filed with the Commission in Case No. EM-2000-464 and is incorporated herein by reference.

3. KCPL has 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, except as listed in Exhibit A. KCPL has a general rate case pending before the Commission in Case No. ER-2006-0314. KCPL has no overdue Commission annual reports or assessment fees.

4. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Tim Rush
Director- Regulatory Affairs
Kansas City Power & Light Company
1201 Walnut – 13th Floor
Kansas City, Missouri 64106
Phone: (816) 556-2344
Fax: (816) 556-2110
E-mail: Tim.Rush@kcpl.com

Curtis Blanc
Kansas City Power & Light Company
1201 Walnut – 20th Floor
Kansas City, Missouri 64141
Phone: (816) 556-2483
Fax: (816) 556-2787
Email: Curtis.Blanc@kcpl.com

5. On June 23, 2006, Aquila, Inc. (“Aquila”) submitted an application to the Commission in the above-captioned proceeding seeking a certificate of public convenience and necessity authorizing Aquila to construct and operate an electrical distribution substation and related facilities to be located within Jackson County, within incorporated Kansas City and near the City of Raymore, Missouri (the “Raymore North Substation”). The Commission issued an Order and Notice on February June 28, 2006, wherein, among other things, the Commission ordered that any interested party seeking to intervene do so by July 13, 2006.

6. In the June 28, 2006 Order and Notice the Commission questioned, “whether Aquila needs to presently seek Commission authority to construct the proposed substation.” As an electric utility with transmission and distribution assets located in Missouri, KCPL will likely

be impacted by the Commission's resolution of this issue. Consequently, KCPL'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 KCPL's legal and financial interests.

7. KCPL believes that it is unnecessary for Aquila to seek the relief it requests in this proceeding.

WHEREFORE, KCPL respectfully requests that the Commission issue an order authorizing it to intervene in the above-captioned matter.

Respectfully submitted,

/s/ *Curtis D. Blanc*

Curtis D. Blanc (Mo. Bar. No. 58052)
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Email: Curtis.Blanc@kcpl.com

Counsel for Kansas City Power & Light Company

Dated: July 13, 2006

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, this 13th day of July, 2006, to:

Office of the Public Counsel
Governor Office Building
200 Madison Street, Suite 650
Post Office Box 2230
Jefferson City, Missouri 65102

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Paul A. Boudreau
Brydon, Swearngen & England, P.C.
312 East Capitol Avenue
Post Office Box 456
Jefferson City, Missouri 65102

/s/ *Curtis D. Blanc*
Curtis D. Blanc

Exhibit A:

The following is a listing of Applicant's pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this application:

1. *Vandora R. Henry v. Kansas City Power & Light Co.*, MPSC Case No. EC-2006-0412.
2. *Tony Walker v. Kansas City Power & Light Co.*, MPSC Case No. EC-2006-0451.