

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

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

APPLICATION TO INTERVENE

COMES NOW the Missouri Joint Municipal Electric Utility Commission (MJMEUC), pursuant to the *Commission's Order Directing Notice and Order Directing Filing*, issued on April 9, 2007, and 4 CSR 240-2.075, and for its *Application To Intervene* in the above-captioned cause, respectfully states as follows:

1. MJMEUC's legal name is the Missouri Joint Municipal Electric Utility Commission. The MJMEUC is a political subdivision of the State of Missouri, organized and existing as a joint municipal utility commission pursuant to Section 393.700 et seq. RSMo 2000, with the authority to exercise public powers of a body corporate and politic of the State of Missouri for the benefit of the inhabitants of those municipalities contracting to establish the MJMEUC. Fifty-eight Missouri municipalities currently are parties to the joint contract establishing the MJMEUC. The MJMEUC's mailing address and principal office is 2407 East Ash, Columbia, Missouri 65203, telephone (573) 445-3279, fax number (573) 445-0680.

2. All communications, correspondence, pleadings, notices and orders relating to this matter should be sent to:

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3. The MJMEUC is not subject to the jurisdiction of the Commission so the provisions of 4 CSR 240-2.060(1)(K) and (L) do not apply for purposes of this Application. The MJMEUC is not an “association”, but rather a separate body corporate and politic pursuant to Section 393.720 RSMo 2000, so 4 CSR 240-2.060(1)(J) and 4 CSR 240-2.075(3) likewise do not apply for purposes of this Application.

4. Pursuant to 4 CSR 240-2.075(2), the MJMEUC states that it is a wholesale energy and transmission customer of Kansas City Power and Light Company, both directly and on behalf of its contracting municipalities. The MJMEUC and some of its contracting municipalities also receive transmission service from Aquila, Inc. The MJMEUC also has a partial ownership interest in the Iatan 2 generating facility.

5. Accordingly, the MJMEUC has interests in this proceeding which are distinct and different than that of the general public. These unique interests cannot be adequately represented by any other party, including the Office of the Public Counsel and the Commission Staff, and could be adversely affected by a final order of the Commission in this proceeding.

6. Moreover, allowing the MJMEUC to intervene and participate in this proceeding will serve the public interest due to the MJMEUC’s status as a body corporate and politic of this state, whose statutory purpose is to serve the interests of its contracting municipalities and their respective municipal ratepayers.

7. At this time, the MJMEUC neither supports nor opposes the relief sought and is unsure of the position or the positions it will take in this proceeding.

WHEREFORE, having complied with the requirements of 4 CSR 240-2.075, the Missouri Joint Municipal Electric Utility Commission respectfully requests that it be allowed to intervene and participate in this proceeding.

Respectfully submitted,

/s/ Charles Brent Stewart

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ATTORNEY FOR MJMEUC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing Application To Intervene was sent to counsel for all parties of record in Case No. EM-2007-0374 by depositing same in the U.S. Mail, first class postage prepaid, by hand-delivery, or by electronic mail transmission, this 27th day of April, 2007.

/s/ Charles Brent Stewart
