

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

In the Matter of Kansas City Power & Light Company's)	
Application for Approval of Demand Side Programs)	Case No. ER-2012-0008
and for Authority to Establish a Demand Side)	
Programs Investment Mechanism)	

**APPLICATION TO INTEVENE OF
THE UNITED STATES DEPARTMENT OF ENERGY,
THE NATIONAL NUCLEAR SECURITY ADMINISTRATION,
AND THE FEDERAL EXECUTIVE AGENCIES**

COME NOW, the United States Department of Energy ("DOE") and the United States National Nuclear Security Administration ("NNSA"), on behalf of themselves and all other affected Federal Executive Agencies ("FEA") (collectively "DOE/NNSA"), and apply, in accordance with the Missouri Code of State Regulations (CSR) §240-2.075, to intervene and be accorded full party status herein. For this application, DOE/NNSA respectfully state:

1. A delegation of authority from the General Services Administration, under 49 U.S.C. § 481 (a) (4) , empowers DOE/NNSA to represent all federal executive agencies located in Kansas City Power & Light Company's ("KCPL") service territory;

2. DOE/NNSA operates the NNSA Kansas City Site Office, and an industrial facility located in Kansas City, Missouri. The site office and the industrial facility together consume approximately 160,000 mWhs of electric power annually, at an annual cost to DOE/NNSA of approximately \$6 million. For this reason, DOE/NNSA's interests will be materially and substantially affected by the KCPL requests which are the subject of the present proceeding, and differ materially from the interests of the general public and those of all other interveners herein. The interests of other federal executive agencies may also materially and substantially affected by those requests;

3. DOE/NNSA has not yet ascertained the positions that it will take in this case;
4. The undersigned attorneys for DOE/NNSA, Steven A. Porter and Arthur Perry Bruder, are not admitted to practice before the courts of the State of Missouri, and are admitted to practice before the courts of the states of Texas and New York, respectively. Mr. Porter and Mr. Bruder have been in the active practice of law since 1981 and 1970, respectively. Neither Mr. Porter nor Mr. Bruder is under suspension or disbarment by any of the courts of the state in which he is admitted to practice;
5. One or both of the undersigned attorneys will in the near future petition for leave to appear *pro hac vice* herein. DOE/NNSA respectfully requests that this application be granted, pending completion and approval of that or those petition(s);
6. DOE/NNSA designates Ms. Therese Leblanc as associate counsel herein. Ms. Leblanc is a member of the Missouri Bar (LLC Mo. Bar # 50363), has an office at 2000 E. 95th St. (PO Box 4191590), Kansas City, MO 64141, and will enter an appearance as DOE/NNSA associate counsel herein;
7. DOE/NNSA respectfully requests that it be allowed to participate via telephone in the January 17, 2012 prehearing conference that the Commission has scheduled in this proceeding;
8. Correspondence, communications, and all other materials regarding this application, including all Commission notices, decisions, and orders, should be addressed to:

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WHEREFORE, the applicant respectfully requests that the Commission grant its request to intervene and be accorded full party status in this docket.

Respectfully submitted this 11th day of January, 2011.



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Dated: January 11, 2012

CERTIFICATE OF FILING AND SERVICE

I hereby certify that, on January 11, 2012, I caused the foregoing Application to Intervene of the United States Department of Energy, the National Nuclear Security Administration, and the Federal Executive Agencies to be:

(1) formally filed with the Missouri Public Service Commission on the Commission's website, via the Commission's Electronic Filing and Information System ("EFIS"), in accordance with applicable procedure;

(2) served on all of the individuals listed on the Commission's service list for Doc. No. EO-2012-0008, by:

(a) transmitting it as an attachment to an email which was sent to each of the following:

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(2) sending a printed copy of it via First Class U. S. Mail to the following addressees:

County of Chariton, Missouri
County Commission Clerk
306 S. Cherry
Chariton County Courthouse
Keytesville, MO 65261

County of Howard, MO
County Commission Clerk
1 Courthouse Sq.
Fayette, MO 65248

County of Clay, Missouri
County Commission Clerk
1 Courthouse Sq.
Administration Bldg.
Liberty, MO 64068

County of Saline, Missouri
County Commission Clerk
101 East Arrow Room 206
Saline County Courthouse
Marshall, MO 65340


County of Jackson, Missouri
Legal Department
415 E. 12th Street
Kansas City, MO 64106

County of Pettis, Missouri
County Commission Clerk
415 S. Ohio
Room 206
Pettis County Courthouse
Sedalia, MO 65301

County of Platt, Missouri
County Commission Clerk
415 Third St. Ste. 30
Platte County Administration Bldg.
Platte City, MO 640798

County of Cass, Missouri
County Commission Clerk
102 East Wall Street
Cass County Courthouse
Harrisonville, MO 64701

County of Lafayette, Missouri
County Commission Clerk
1001 Main St. Room 103
Lafayette County Courthouse
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