

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

In the Matter of the Resource Plan of Aquila, Inc.,)	
d/b/a Aquila Networks-MPS and Aquila Networks-)	Case No. EO-2007-0298
L&P Pursuant to 4 CSR 240-22)	

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

Pursuant to 4 CSR 240-2.075 and the Order Directing Notice issued by the Missouri Public Service Commission ("Commission") on February 7, 2007 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 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, except as listed in Exhibit A. KCPL has a general rate case pending before the Commission in Case No. ER-2007-0291. 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 February 5, 2007, Aquila, Inc., d/b/a/ Aquila Networks-MPS and Aquila Networks-L&P (“Aquila”), filed its Utility Resource Filing as required by 4 CSR 240 – Chapter 22. The Commission issued an Order Directing Notice on February 7, 2007, wherein, among other things, the Commission ordered that any interested party seeking to intervene do so by February 27, 2007.

6. As a partner in both the Iatan Unit 1 and Iatan Unit 2 generating stations, 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 interests. KCPL does not anticipate opposing the relief sought by Aquila 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: February 23, 2007

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 23rd day of February, 2007, 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. *Cheryl L. Fabulae v. Kansas City Power & Light Co.*, MPSC Case No. EC-2007-0146.
2. *Erika Bush v. Kansas City Power & Light Co.*, MPSC Case No. EC-2007-0186.