

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

In the Matter of the 2009 Resource Plan of KCP&L )  
Greater Missouri Operations Company Pursuant ) Case No. EE-2009-0237  
to 4 CSR 240-22 )

**APPLICATION TO INTERVENE**

COMES NOW the City of Kansas City, Missouri (hereinafter sometimes Kansas City), pursuant to 4 CSR 240-2.075 of the Rules of Practice and Procedure, and for its Application to Intervene respectfully states:

1. The City of Kansas City, Missouri, is a municipality of the State of Missouri.
2. Correspondence, communications, orders and the decision in this matter should be addressed to:

William D. Geary  
Assistant City Attorney  
2700 City Hall  
414 E. 12th St.  
Kansas City, MO 64106  
Telephone No.: 816/513-3118  
Fax No.: 816/513-3133

Mark W. Comley  
Newman, Comley & Ruth P.C.  
P.O. Box 537  
Jefferson City, MO 65102-0537  
Telephone No.: 573/634-2266  
Fax No.: 573/636-3306

3. This case arose when KCP&L Greater Missouri Operations Company ("GMO") filed its 2009 Integrated Resource Planning Filing (IRP) as required by 4 CSR 240 - Chapter 22. On August 6, 2009, the Commission issued an order and notice directing that interested parties

wishing to intervene must do so on or before August 26, 2009. This application is therefore timely.

4. The City acts as the administrator of low income weatherization funding in a three county area and the provider of administrative services for GMO's existing low income weatherization program; one of its demand side management programs. Any decisions in this matter affecting GMO's demand side management programs may have a direct impact on the City. The City has an interest in this proceeding that is different from that of the general public.

5. The City believes that its participation in the matter will be important to the other parties, and would assist the Commission in any deliberations on the subject matter. Its intervention is in the public interest.

6. At this time, Kansas City is uncertain of the position it will take in this matter.

WHEREFORE, for the foregoing reasons, the City of Kansas City, Missouri, respectfully requests that the Commission grant its Application to Intervene in this matter, and thereby entitle the City to have notice and to appear at the taking of testimony, to produce and cross-examine witnesses and to be heard on the argument, and in all other respects fully participate in this proceeding.

Respectfully submitted,

/s/ Mark W. Comley

Mark W. Comley #28847  
NEWMAN, COMLEY & RUTH P.C.  
601 Monroe Street, Suite 301  
P.O. Box 537  
Jefferson City, MO 65102-0537  
(573) 634-2266  
(573) 636-3306 (FAX)

Attorneys for City of Kansas City, Missouri

ATTORNEY VERIFICATION

STATE OF MISSOURI       )  
  ) ss.  
COUNTY OF COLE        )

I, Mark W. Comley, being first duly sworn, do hereby certify, depose and state that I am the attorney for The City of Kansas City, Missouri which seeks intervention in the above captioned proceeding before the Missouri Public Service Commission; that I have read the above and foregoing Application to Intervene and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing application by the above said applicant to intervene.

/s/ Mark W. Comley  
Mark W. Comley

Subscribed and sworn to before me, a Notary Public, this 20<sup>th</sup> day of August, 2009.

/s/ Annette M. Borghardt  
Notary Public for Cole County, MO  
Commission # 06436657; MCE 3/11/2010

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 20<sup>th</sup> day of August, 2009, to:

Office of Public Counsel at opcservice@ded.mo.gov;  
General Counsel's Office at gencounsel@psc.mo.gov;  
Carl Lumley at clumley@lawfirmemail.com;  
Curtis Blanc at Curtis.Blanc@kcpl.com;  
Shelley A. Woods at Shelley.woods@ago.mo.gov;  
David Woodsmall at dwoodsmall@fcplaw.com  
Stuart Conrad at stucon@fcplaw.com.

/s/ Mark W. Comley  
Mark W. Comley