

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

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 Great Plains Energy Incorporated, Kansas City Power & Light Company and Aquila, Inc. (collectively "Joint Applicants") filed a joint application requesting

authority for a series of transactions whereby Aquila will become a direct, wholly-owned subsidiary of Great Plains Energy. On April 9, 2007, the Commission issued an order and notice directing that interested parties wishing to intervene must do so on or before April 30, 2007. This application is therefore timely.

4. Kansas City is itself a large consumer of energy supplied by Aquila and Kansas City Power & Light Company. Kansas City is interested in the impact of any decisions in this proceeding on behalf of itself and its residents and businesses. It desires to participate fully in this proceeding including hearing and the briefing of the issues.

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

6. Granting the proposed intervention would serve the public interest.

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

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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 18th day of April, 2007.

/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 18th day of April, 2007, to:

Office of Public Counsel at opcservice@ded.mo.gov;
General Counsel's Office at gencounsel@psc.mo.gov;
James C. Swearengen and Paul A. Boudreau at paulb@brydonlaw.com;
Karl Zobrist at kzobrist@sonnenschein.com;
James M. Fischer at jfischerpc@aol.com;
Renee Parsons at renee.parsons@aquila.com;
Stuart Conrad at stucon@fcplaw.com;
Union Electric Company Legal Dept. at mlyons@ameren.com;

and via U.S. Mail, postage prepaid, to:
Trigen-Kansas City Energy Corporation Legal Dept.
115 Grand Avenue
Kansas City, MO 64106.

/s/ Mark W. Comley

Mark W. Comley