

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In The Matter of the Application of Aquila, )  
Inc. for Permission and Approval and a )  
Certificate of Public Convenience and )  
Necessity Authorizing it to Acquire, )  
Construct, Install, Own, Operate, ) Case No. EA-2009-0118  
Maintain and otherwise Control and )  
Manage Electrical Production and )  
Related Facilities in Certain Areas )  
of Cass County, Missouri Near the )  
City of Peculiar. )

**APPLICATION TO INTERVENE**

COMES NOW the County of Cass, Missouri (hereinafter Cass County), pursuant to 4  
CSR 240-2.075 of the Commission's Rules of Practice and Procedure, and for its Application to  
Intervene respectfully states:

1. Cass County is a First Class County of the State of Missouri under the county  
classification provisions of Chapter 48, RSMo 2000, and is a political subdivision of the state  
with powers, duties and obligations as provided by law. Its offices are located in Harrisonville,  
Missouri, the county seat.

2. Correspondence, communications, orders and the decision in this matter should be  
addressed to:

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3. This case arose upon Aquila's<sup>1</sup> filing of an Application that seeks from the Commission, among other things, a certificate of convenience and necessity to construct, own, operate and manage an electrical power production facility and associated electric transmission substations to be located on tracts of property near the City of Peculiar in Cass County, Missouri (the South Harper Facility and Peculiar Substation).

4. Construction of Aquila's South Harper plant has had a direct impact on Cass County and those who reside there. The Commission's decision in this case will have an effect on Cass County and its constituency unlike that which might be experienced by the public. Cass County's interest in this proceeding is different from that of the general public. Its intervention would be in the public interest.

5. Assuming that under existing law Aquila is now eligible for the relief it requests, Cass County does not oppose the Application.

WHEREFORE, for the foregoing reasons, the Cass County, Missouri, respectfully requests that the Commission grant its Application to Intervene in this matter.

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<sup>1</sup> As used in Cass County's application, "Aquila" means and refers to Aquila, Inc. d/b/a KCP&L Greater Missouri Operations Company.

Respectfully submitted,

NEWMAN, COMLEY & RUTH P.C.

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ATTORNEYS FOR CASS COUNTY, MISSOURI

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 15th day of October, 2008 to the Office of General Counsel at [gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov); Office of Public Counsel at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov); James M. Fischer at [jfischerpc@aol.com](mailto:jfischerpc@aol.com); Curtis Blanc at [Curtis.blank@cpl.com](mailto:Curtis.blank@cpl.com); William Riggins at [bill.riggins@kcpl.com](mailto:bill.riggins@kcpl.com); Karl Zobrist at [kzobrist@sonnenschein.com](mailto:kzobrist@sonnenschein.com); and Roger Steiner at [rsteiner@sonnenschein.com](mailto:rsteiner@sonnenschein.com).

/s/ Mark W. Comley  
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