

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

In the Matter of the Application of KCP&L Greater Missouri Operations Company for Approval to Make Certain Changes in its Charges for Electric Service ) ) Case No. ER-2010-0356 )

**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:

Brian T. Rabineau  
Assistant City Attorney  
27<sup>th</sup> Floor City Hall  
414 E. 12th St.  
Kansas City, MO 64106  
Telephone No.: 816/513-3152  
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Mark W. Comley  
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P.O. Box 537  
Jefferson City, MO 65102-0537  
Telephone No.: 573/634-2266  
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3. This case arose when KCP&L Greater Missouri Operations Company ("GMO") filed its proposed tariff sheets to implement a general rate increase for electrical service provided in GMO's MPS and L&P Divisions in Missouri. On June 11, 2010, the Commission issued an

order directing filing and directing notice directing that interested parties wishing to intervene must do so on or before July 1, 2010. This application is therefore timely.

4. The City is a significant consumer of GMO energy particularly at its international airport. The City also 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 price of energy or its 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

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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 15th day of June, 2010.

/s/ Annette M. Borghardt

Notary Public for Cole County, MO  
Commission # 10436657; MCE 3/11/2014

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 15th day of June, 2010, to:

Office of Public Counsel at opcservice@ded.mo.gov;

General Counsel's Office at [gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov);  
James M. Fischer at [jfischerpc@aol.com](mailto:jfischerpc@aol.com);  
William Riggins at [bill.riggins@kcpl.com](mailto:bill.riggins@kcpl.com); and  
Roger Steiner at [rsteiner@sonnenschein.com](mailto:rsteiner@sonnenschein.com).

**/s/ Mark W. Comley**

Mark W. Comley