

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

In the Matter of KCP&L Greater Missouri Operations            )  
Company's Request for Authority to Implement                    )        Case No. ER-2016-0156  
A General Rate Increase for Electric Service                    )

**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  
City Attorney  
17<sup>th</sup> Floor 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 ("KCP&L GMO") filed proposed tariff sheets to implement a general rate increase for electrical service. On March 3, 2016, the Commission issued an order and notice directing that interested parties

wishing to intervene must do so on or before March 17, 2016. This application is therefore timely.

4. Kansas City, acting through its several departments and affiliated agencies, is itself a consumer of energy supplied by KCP&L GMO. The City's interest in this proceeding is different from that of the general public. It is interested in the impact of any decisions in this proceeding on behalf of itself, its residents, businesses or visitors, whose interests, and the City's, may be adversely affected by a final decision in this case. It desires to participate fully in this proceeding including hearing and the briefing of the issues.

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 14th day of March, 2016.

/s/ Annette M. Borghardt  
Notary Public for Cole County, MO  
Commission # 14436657; MCE 3/13/2018

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 14th day of March, 2016, to:

Office of Public Counsel at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov);  
General Counsel's Office at [staffcounsellservice@psc.mo.gov](mailto:staffcounsellservice@psc.mo.gov);  
Nathan Williams at [Nathan.Williams@psc.mo.gov](mailto:Nathan.Williams@psc.mo.gov);  
Robert Hack at [rob.hack@kcpl.com](mailto:rob.hack@kcpl.com);  
Roger Steiner at [roger.steiner@kcpl.com](mailto:roger.steiner@kcpl.com);  
James M. Fischer at [jfischerpc@aol.com](mailto:jfischerpc@aol.com);  
Joshua Harden at [joshua.harden@dentons.com](mailto:joshua.harden@dentons.com); and  
Karl Zobrist at [karl.zobrist@dentons.com](mailto:karl.zobrist@dentons.com).

/s/ Mark W. Comley  
Mark W. Comley