

In the Matter of the Resource Plan of)
Kansas City Power & Light Company) File No. EO-2012-0323

In the Matter of the Resource Plan of)
KCP&L Greater Missouri Operations Company) File No. EO-2012-0324

COMES NOW Southern Union Company (“Southern Union”) d/b/a Missouri Gas Energy (“MGE”), by and through counsel, pursuant to 4 CSR 240-2.075, and for its application to intervene in the above-captioned proceedings, respectfully states as follows to the Missouri Public Service Commission (the “Commission”):

2. MGE's principal Missouri office is located at 3420 Broadway, Kansas City, Missouri, 64111.

4. Communications relating to this application and proceeding should be directed to the undersigned counsel and the following:

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5. On April 9, 2012, Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) filed with the Missouri Public Service Commission (“Commission”) their 2012 Integrated Resource Plans (IRP), which is required by the Commission’s Electric Utility Resource Planning rule, 4 CSR 240-22.

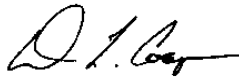
6. By the Commission’s Order Directing Notice and Setting Date for Submission of Intervention Requests issued April 12, 2012, the Commission directed that applications to intervene be filed by May 3, 2012.

7. MGE should be allowed to intervene in this proceeding, because MGE has an interest that is different from that of the “general public” and because granting intervention to MGE would serve the public interest. As a provider of natural gas service in a territory which substantially overlaps the territory in which KCPL and GMO provide electric service, MGE’s services and demand-side efforts are interrelated with those of KCPL and GMO. Commission integrated resource planning rule, among other things, requires the evaluation of demand-side programs with the purpose of developing the information necessary to improve the design of existing and future demand-side programs. Consequently, MGE’s interest in this proceeding relates primarily to issues in the areas of demand-side programs. MGE’s status as a Missouri public utility and MGE’s direct specific interests in a subject of this proceeding indicate that its intervention would serve the public interest.

8. MGE does not yet know what issues will arise in this proceeding and, as such, cannot yet state precisely its position. MGE will submit such information when, and if, it is required by the filing schedule and requirements.

WHEREFORE, for the reasons stated herein, MGE respectfully requests that the Commission issue an order permitting it to intervene in these cases with full rights as a party hereto.

Respectfully submitted,



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ATTORNEYS FOR MISSOURI GAS ENERGY

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 3rd day of May, 2012, to:

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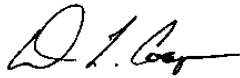
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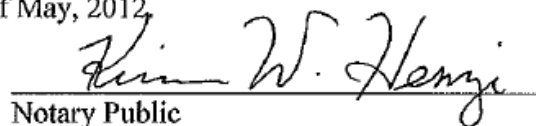
AFFIDAVIT

STATE OF MISSOURI)
)
COUNTY OF JACKSON) ss

I, Michael R. Noack, having been duly sworn upon my oath, state that I am Director of Pricing and Regulatory Affairs of Southern Union Company, d/b/a Missouri Gas Energy (MGE), that I am duly authorized to make this affidavit on behalf of MGE, and that the matters and things stated in the foregoing application are true and correct to the best of my information, knowledge and belief.



Subscribed and sworn to before me this 3rd day of May, 2012


Notary Public

My Commission Expires:

Feb. 22, 2015

