

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Trigen-Kansas City Energy       )  
Corporation's Tariffs to Increase Rates for       )       Case No. HR-2008-0300  
Customers of its Steam 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  
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 Trigen-Kansas City Energy Corporation (“Trigen”) filed tariffs designed to implement a general rate increase for steam service. On March 12, 2008, the Commission issued an order and notice directing that interested parties wishing to intervene must do so on or before April 1, 2008. This application is therefore timely.

4. Kansas City is itself a consumer of steam service supplied by Trigen. 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 1st day of April, 2008.

/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 1st day of April, 2008, to:

Office of Public Counsel at opcservice@ded.mo.gov;  
General Counsel's Office at gencounsel@psc.mo.gov; and  
Jeff Keevil at per594@aol.com.

/s/ Mark W. Comley  
Mark W. Comley