

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

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

APPLICATION TO INTERVENE

COMES NOW the City of Kansas City, Missouri (hereinafter sometimes Kansas City or 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
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 KCP&L Greater Missouri Operations Company (GMO) filed its 2012 Integrated Resource Plan (IRP) as required by 4 CSR 240 - Chapter 22. On April 12, 2012, the Commission issued an order and notice directing that interested parties wishing to intervene must do so on or before April 30, 2012. This application is therefore timely.

4. At the time this case was filed, GMO's general rate case, Case No. ER-2012-0175, was also pending. The City's application to intervene in Case No. ER-2012-0175 was granted.

5. Kansas City, acting through its several departments and affiliated agencies---particularly its Aviation Department---is itself a large consumer of energy supplied by GMO. The present demand for energy from GMO, and the GMO systems in place for delivering that energy, for operation of the Kansas City International Airport (KCI) are important matters for the City. Kansas City anticipates significant changes to KCI's architecture and energy demand in the next decade, if not sooner. Consequently, 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 the result in this case. It desires to participate fully in this proceeding including hearing and the briefing of the issues.

6. 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.

7. 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 27th day of April, 2012.

/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 27th day of April, 2012, to:

Office of Public Counsel at opcservice@ded.mo.gov;
General Counsel's Office at gencounsel@psc.mo.gov;
James M. Fischer at jfischerpc@aol.com;
Roger W. Steiner at roger.steiner@kcpl.com;
Steve Dottheim at Steve.Dottheim@psc.mo.gov.

/s/ Mark W. Comley

Mark W. Comley