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

In the Matter of the Application of	)	
KCP&L Greater Missouri Operations	)	
Company for Authority to Transfer Functional	)	Case No. EO-2009-0179
Control of Certain Transmission Assets	)	
to the Southwest Power Pool. Inc.	)	

## APPLICATION OF SOUTHWEST POWER POOL, INC. TO INTERVENE

COMES NOW Southwest Power Pool, Inc. ("SPP"), by and through its counsel and pursuant to 4 CSR 240-2.075, and applies to intervene in this matter. In support of its Application, SPP states as follows to the Missouri Public Service Commission ("Commission"):

- 1. On November 12, 2008, KCP&L Greater Missouri Operations Company (KCP&L-GMO) filed its Application in the above-referenced case to transfer functional control of certain transmission assets to SPP in accordance with the SPP Membership Agreement and to take network integration transmission service from SPP to serve KCP&L-GMO's retail load.
- 2. SPP is an Arkansas non-profit corporation with its principal place of business in Little Rock, Arkansas. SPP functions as a Transmission Provider as part of being a Federal Energy Regulatory Commission ("FERC") approved Regional Transmission Organization ("RTO") as described in more detail in KCP&L-GMO's Application. KCP&L-GMO's Application provides a description of SPP, including a list of SPP's current members for the Commission's reference. See Appendix C of KCP&L-GMO's Application.

3. Pleadings, notices and orders and other communications in this matter should be addressed to the following:

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4. If KCP&L-GMO's Application is granted by the Commission, SPP will become responsible for the functional control of KCP&L-GMO's transmission assets in accordance with the SPP Membership Agreement. Therefore, SPP's interest in this proceeding is different from that of the general public and will be affected by the Commission's determination. In addition, inasmuch as the Commission's determination may have an impact on the provision of regional transmission service to the State of Missouri, SPP's intervention is in the public interest of the State of Missouri.

5. Pursuant to 4 CSR 240-2.075(2), SPP states that it supports KCP&L-GMO's Application.

WHEREFORE, for the foregoing reasons, SPP respectfully requests permission to intervene as a party in the above-entitled matter.

Respectfully submitted,

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Attorneys for Southwest Power Pool, Inc.

Dated: November 19, 2008

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing Application of Southwest Power Pool, Inc. to Intervene was e-mailed on this 19th day of November, 2008, to the counsel for KCP&L-GMO, Staff of the Missouri Public Service Commission, Office of Public Counsel, and all counsel of record in Case No. EO-2008-0046.

David C. Linton