

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

In the Matter of the Application of Kansas                    )  
City Power & Light Company for Authority to                )  
Extend the Transfer of Functional Control of                 )       File No. EO-2012-0135  
Certain Transmission Assets to the Southwest                )  
Power Pool, Inc.    )

**Motion to Intervene  
of Southwest Power Pool, Inc.**

COMES NOW, Southwest Power Pool, Inc. (“SPP”), by and through its counsel, and for its application to intervene in the above referenced case, states as follows:

1. On September 30, 2011, Kansas City Power & Light Company (“KCP&L”) submitted an interim report, in Case No. EO-2006-0142, regarding its participation in SPP. In that report, KCP&L requested that the Commission approve the continued participation in SPP beyond October 1, 2013, without a service agreement. On November 1, 2011, the Commission opened this case to address KCP&L’s request.
2. Thereafter, on November 2, 2011, the Commission issued an order providing notice of KCP&L’s request and setting a deadline of November 22, 2011 for applications to intervene.
3. SPP is a Federal Energy Regulatory Commission approved Regional Transmission Organization. The address of SPP’s principle office is 415 North McKinley, Suite 140, Little Rock, Arkansas, 72205-3020.
4. KCP&L is a member of SPP and received authority to transfer functional control of certain transmission assets to SPP pursuant to a Stipulation and Agreement and an order of the Commission approving same issued in Case No. EO-2006-0142. This case involves KCP&L’s authority to remain a member of SPP through the extension of its transfer of functional control of its transmission assets to SPP. SPP was a party to Case No. EO-2006-0142 and a signatory to

the Stipulation and Agreement entered into by the parties therein. As such, SPP has an interest in the case which is different from the interest of the general public and which may be adversely affected by a final order arising from the case.

5. SPP supports KCP&L's request in this case.
6. Communications regarding this case should be directed to:

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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.

### Certificate of Service

I hereby certify that a true and correct copy of the foregoing was e-mailed on this 10 th day of November, 2011, to the persons on the Commission's service list in this case.

/s/ David C. Linton  
Attorney for Southwest Power Pool, Inc.