

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

<b>In the Matter of the Joint Application of</b>	)	
<b>Great Plains Energy Incorporated, Kansas City</b>	)	
<b>Power &amp; Light Company, and Aquila, Inc. for</b>	)	<b>Case No. EM-2007-0374</b>
<b>Approval of the Merger of Aquila, Inc. with a</b>	)	
<b>Subsidiary of Great Plains Energy Incorporated</b>	)	
<b>and for Other Related Relief</b>	)	

**CORRECTED APPLICATION TO INTERVENE WITH SUGGESTIONS**

COMES NOW International Brotherhood of Electrical Workers, Local Unions No. 412, 1464, and 1613, ("Locals 412, 1464, and 1613" or the "Locals") by and through their counsel, Blake & Uhlig, P.A., and respectfully submit this Application to Intervene With Suggestions pursuant to 4 CSR 240-2.075 of the Commission's Rules of Practice and Procedure.<sup>1</sup> In support of this Application, the Petitioners state as follows:

1. Locals 412, 1464 and 1613 are voluntary organizations doing business and representing employees in the State of Missouri. The Locals are also labor organizations as defined in the National Labor Relations Act, as amended, 29 U.S.C. § 152, et seq. The Locals have separate collective bargaining agreements with Kansas City Power & Light Company and represent certain employees of KCP&L.

2. The names, addresses and telephone numbers of the Petitioners seeking leave to intervene are:

Ted Stewart, Business Manager  
IBEW Local Union No. 412  
6200 Connecticut, Suite 105  
Kansas City, Missouri 64120  
(816) 231-4530

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<sup>1</sup> This "Corrected Application to Intervene With Suggestions" replaces Document 22, which inadvertently referenced the improper Rule of Practice and Procedure.

Darrell McCubbins, Business Manager  
IBEW Local Union No. 1464  
6200 Connecticut, Suite 105  
Kansas City, Missouri 64120  
(816) 231-1464

Mike Long, Business Manager  
IBEW Local Union No. 1613  
6200 Connecticut, Suite 105  
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Counsel: Jane L. Williams  
James R. Waers  
Blake & Uhlig, P.A.  
753 State Avenue, Suite 475  
Kansas City, Kansas 66101  
(913) 321-8884

3. The Petitioners request that service be made to the Petitioners and their counsel.

4. On April 4, 2007, Great Plains Energy Incorporated ("Great Plains Energy"), Kansas City Power & Light Company ("KCPL" ) and Aquila, Inc. ("Aquila")(collectively, "Joint Applicants") filed a joint application for an order authorizing a series of transactions whereby Aquila will become a direct, wholly-owned subsidiary of Great Plains Energy.

5. On April 9, 2007, the Commission issued an order and notice directing that interested parties wishing to intervene must do so on or before April 30, 2007. /this application is therefore timely.

6. The Locals represent employees employed by Kansas City Power & Light, who may be affected by Orders entered by the Commission in this proceeding to the extent that it may impact on the terms and conditions of employment of the employees that the Petitioners represent. In particular, any potential merging of bargaining units may affect the seniority of said employees. Accordingly, the Petitioners and the employees they represent have a direct interest in this proceeding which is different from that of the general public, and which interests cannot be

adequately represented by any other party.

7. The Petitioners have no current position regarding the Application herein. However, Petitioners reserve the right to participate in the proceedings to the extent necessary to protect the interests of their members.

8. No party will be adversely affected if this Petition is granted.

**WHEREFORE**, having stated the grounds for intervention, their position and interest in this proceeding, the International Brotherhood of Electrical Workers, Local Unions No. 412, 1464; and 1613 hereby request that the Commission:

A. Grant them leave to intervene in this proceeding on their behalf and on behalf of their members and to be heard at such time as the Commission may fix; and

B. In all respects be a party to this proceeding.

Dated this 30th day of April, 2007.

Respectfully submitted,

BLAKE & UHLIG, P.A.  
753 State Avenue, Suite 475  
Kansas City, Kansas 66101  
(913) 321-8884

2500 Holmes  
Kansas City, Missouri 64108  
(816) 472-8883

By: /s/ Jane L. Williams  
Jane L. Williams, Mo. Bar No. 53291  
James R. Waers, Mo. Bar No. 26220

ATTORNEYS FOR IBEW LOCALS 412,  
1464, AND 1613

## ATTORNEY VERIFICATION

STATE OF KANSAS                    )  
  ) ss.  
COUNTY OF WYANDOTTE         )

I, Jane L. Williams, being first duly sworn, do hereby certify, depose and state that I am the attorney for the International Brotherhood of Electrical Workers, Local 412, 1464, and 1613, which seek 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 applicants to intervene.

/s/ Jane L. Williams  
Jane L. Williams

Subscribed and sworn to before me, a Notary Public, this 30th day of April, 2007.

My commission expires:  
12/12/09  
Bond # 990303

/s/ Janet M. Coffee  
Notary Public State of Kansas

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing *Corrected Application to Intervene With Suggestions* was mailed by First-class U.S. Mail, postage prepaid, this 30th day of April, 2007, addressed as follows:

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/s/ Jane L. Williams  
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