

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

Application of Kansas City Power & Light Company	)	
for Approval of the Transfer of Existing Common	)	
Facilities and Permit Interests, and Materials and Supplies	)	Case No. EO-2011-0334
Inventory Administration at the Iatan Generating Station	)	

and

Joint Application of Kansas City Power & Light	)	
Company, KCP&L Greater Missouri Operations	)	
Company and The Empire District Electric Company	)	Case No. EO-2012-0015
for Authority to Enter Into Certain Leases and	)	
Agreements Regarding Existing Common Facilities	)	
at the Iatan Generating Station	)	

**APPLICATION TO INTERVENE**

COMES NOW Kansas Electric Power Cooperative, Inc. (hereinafter sometimes referred to as "KEPCo,") pursuant to 4 CSR 240-2.075 of the Rules of Practice and Procedure, and for its Application to Intervene respectfully states:

1. Kansas Electric Power Cooperative, Inc. is an electric cooperative organized and existing under the laws of the State of Kansas.
2. Correspondence, communications, orders and the decision in this matter should be addressed to:

Mr. J. Michael Peters  
Vice President, Administration and General Counsel  
Kansas Electric Power Cooperative, Inc.  
600 SW Corporate View  
Topeka, KS 66615  
Telephone Number : 785-271-4836  
Fax No: 785-271-4884

Mark W. Comley  
Newman, Comley & Ruth P.C.  
P.O. Box 537  
Jefferson City, MO 65102-0537  
Telephone No.: 573/634-2266  
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***Case No. EO-2011-0334***

3. On March 9, 2012, Kansas City Power & Light Company (“KCPL”) submitted its Application in Case No. EO-2011-0334. KCPL’s Application seeks approval of the transfer of existing common facilities located at the Iatan Generating Station to KEPCo and the Missouri Joint Municipal Electric Utility Commission (“MJMEUC”); approval of the transfer of interests in permits to certain other owners of the new Iatan Unit 2 electric generating facility; and approval for the sale of an interest in utility materials and supplies inventory to KEPCo and MJMEUC.

***EO-2012-0115***

4. Case No. EO-2012-00115 arose when Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company and The Empire District Electric Company filed a joint application for authority to enter into certain leases and agreements regarding existing common facilities at the Iatan Generating Station including leases and agreements pertaining to leases affecting Iatan 2 common facilities and other interests.

5. On March 14, 2012, the Commission issued an order and notice directing that interested parties wishing to intervene in both cases must do so on or before April 9, 2012. This application is therefore timely.

6. Iatan Unit 1 is jointly owned by KCPL, KCP&L Greater Missouri Operations Company (“GMO”), and Empire District Electric Company (“Empire”). Iatan Unit 2 is jointly

owned by KCPL, GMO, Empire, KEPCo, and MJMEUC. Both units are located at the Iatan Generating Station in Platte County, Missouri.

7. KEPCo should be allowed to intervene in this proceeding, because KEPCo has an interest that is different from that of the “general public” and which may be affected by a final order in this case and because granting intervention to KEPCo would serve the public interest. Because KEPCo is a joint owner of Iatan Unit 2, KEPCo’s interests are unique and its intervention herein would serve the public interest.

8. KEPCo 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.

9. KEPCo reserves a declaration of its position in these cases until further review of the filings.

WHEREFORE, for the foregoing reasons, Kansas Electric Power Cooperative, Inc. respectfully requests that the Commission grant its Application to Intervene in these matters, and thereby entitle KEPCo 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 these proceedings.

Respectfully submitted,

**/s/ Mark W. Comley**

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Attorneys for Kansas Electric Power Cooperative,  
Inc.

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 Kansas Electric Power Cooperative, Inc. 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 26th day of March, 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 26th day of March, 2012, to:

Lewis Mills at opcservice@ded.mo.gov;  
General Counsel's Office at gencounsel@psc.mo.gov;  
Nathan Williams at Nathan.Williams@psc.mo.gov;  
Diana Carter at DCarter@brydonlaw.com;  
James M. Fischer at jfischerpc@aol.com; and  
Roger W. Steiner at roger.steiner@kcpl.com.

/s/ Mark W. Comley  
Mark W. Comley