

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

In the Matter of the Joint Application of Great)
Plains Energy Inc., Kansas City Power & Light)
Company and KCP&L Greater Missouri Operations) **Case No. EE-2017-0113**
Company for a Variance from the Commission's)
Affiliate Transactions Rule, 4 CSR 240-20.015)

APPLICATION TO INTERVENE

COME 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. In support of this Application, the Petitioners state as follows:

1. IBEW 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 exclusively represent approximately 1,720 employees of KCP&L, whom will be affected by the instant proceeding.

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

Bill McDaniel, Business Manager
IBEW Local Union No. 412
1760 Universal Ave.
Kansas City, MO 64120
(816) 231-4530

Darrell McCubbins, Business Manager
IBEW Local Union No. 1464
1760 Universal Ave.
Kansas City, MO 64120
(816) 231-1464

Dave Pinon, Business Manager
IBEW Local Union No. 1613
6900 Executive Dr., Suite 180
Kansas City, Missouri 64120
(816) 241-1613

Counsel: Michael Amash
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' counsel.
4. The Petitioners represent employees who may be affected by Orders entered by the Commission in this proceeding, and, accordingly, the Petitioners and the employees they represent are interested parties in this proceeding. The Petitioners herein 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.
5. In its capacity as exclusive bargaining representative, the Locals have a legal Duty of Representation, to those employees it represents. No other person or entity is obligated to represent these individuals, nor does any other person or entity have a legal right to represent these individuals. Petitioner's duty of representation includes the ability of Petitioner to represent the employee's interest in the instant rate case.
6. The Locals' 1,720 members reside in communities both in Missouri and Kansas and those individuals and their local communities will be directly affected by this proceeding.

7. The Petitioners have no current position regarding the Joint Application for Variance and the non-unanimous stipulation and agreement filed on October 12, 2016. However, to the extent that said Application may impact on the composition of the workforce, wages, benefits, and terms and other terms and conditions of employment of the employees that the Petitioners represent, Petitioners reserve the right to participate in the proceedings to the extent necessary to protect the interests of their members and make a determination regarding its support or opposition to the stipulation upon further investigation and review of this matter.

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:

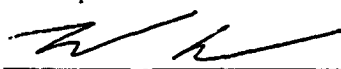
- A. Grant them leave to intervene in this proceeding on their behalf and on behalf of their members and to be heard at such time as the Commission may fix; and
- B. In all respects be a party to this proceeding.

Dated this 25th day of October 2016.

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: 
Michael E. Amash, Mo. Bar No. 58478

ATTORNEYS FOR IBEW LOCALS 412,
1464, AND 1613

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *Application to Intervene* was served upon all parties to this action, either by U.S. Mail, Hand-delivered, transmitted by Facsimile or electronically mailed, this 25th day of October 2016.

A handwritten signature in black ink, consisting of a stylized 'W' followed by a horizontal line and a short vertical stroke.

Attorney for IBEW 412, 1464, and 1613