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

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

## APPLICATION TO INTERVENE

COMES NOW the City of Lee's Summit, Missouri ("Lee's Summit") and for its Application to Intervene pursuant to 4 CSR 240-2.075 of the Rules of Practice and Procedure for the Missouri Public Service Commission ("Commission") states:

- That Lee's Summit is a constitutional charter city pursuant to Chapter 82 of the Missouri Revised Statutes and Article VI, section 19 of the Missouri Constitution and is a political subdivision and municipal corporation of the State of Missouri
- That correspondence, communications and orders and decisions in the abovecaptioned matter should be addressed to:

Robert Handley
City Attorney
220 SE Green Street
Lee's Summit, MO 64063
Telephone: (816) 969-1414

Fax: (816) 969-1401

Email: robert handley@lees-summit mo us

The above-captioned matter concerns a joint application filed by Great Plains Energy Incorporated ("Great Plains"), Kansas City Power & Light Company ("KCPL") and Aquila, Inc. ("Aquila")(collectively "Joint Applicants") in which authority is sought for numerous transactions pursuant to which Aquila will become a direct, wholly owned subsidiary of Great Plains. The Commission issued its Order and Notice on April 9, 2007, directing that

any interested parties may apply to intervene on or before April 30, 2007. Lee's Summit's Application to Intervene has been submitted prior to the deadline set by the Commission and is therefore timely filed.

- Aquila supplies electric service to Lee's Summit and to residential, commercial and industrial customers located within the corporate limits of Lee's Summit. As a large customer and as a political subdivision and municipal corporation, Lee's Summit has an interest in the above-captioned matter on its own behalf and on behalf of its residents and businesses located within the corporate limits of Lee's Summit.
- Lee's Summit has an interest in the decisions made by the Commission on the authority for the transactions sought by Joint Applicants which is different from that of the general public and Lee's Summit wishes to fully participate in these proceedings.
- 6. At this time, Lee's Summit is unsure of the position it will take on any of the issues in this proceeding.
  - 7. Granting Lee's Summit's Application to Intervene will serve the public interest.

WHEREFORE, for the reasons set forth above, Lee's Summit respectfully requests that the Commission grant its Application to Intervene in this matter, and thereby entitle the City to have notice and to fully participate in these proceedings.

Respectfully submitted

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Robert Handley

City Attorney

220 SE Green Street

Lee's Summit, MO 64063

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Fax: (816) 969-1401

Email: robert handley@lees-summit mo us

Attorney for City of Lee's Summit, Missouri

## VERIFICATION

State of Missouri	)
	) ss
County of Jackson	)

I, Robert Handley, being first duly sworn, do hereby certify, depose and state that I am the City Attorney for the City of Lee's Summit, Missouri, which seeks to intervene in the above-captioned matter pending before the Missouri Public Service Commission; that I have read the above and foregoing Application to Intervene and that the statements made therein are true and correct to the best of my knowledge, information and belief; and that I am authorized to make this verification and to submit the Application to Intervene by the City of Lee's Summit, Missouri.

Robert Handley

Subscribed and sworn to before me, a Notary Public, this 30<sup>±</sup> day of April, 2007.

Notary Public

"NOTARY SEAL"
Colleen M. Fetz, Notary Public
Jackson County, State of Missouri
My Commission Expires 9/16/2010
Commission Number 06393963

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Application to Intervene has been served by U.S. Mail, postage prepaid or by electronic mail to all counsel of record this 30 day of April, 2007.

Robert Handley