

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

In the Matter of the Trigen-Kansas City Energy)
Corporation's Tariffs to Increase Rates for) Case No. HR-2008-0300
Customers of its Steam Service)

**APPLICATION OF KANSAS CITY POWER & LIGHT COMPANY
FOR LEAVE TO INTERVENE**

Pursuant to 4 CSR 240-2.075 and the Order Directing Notice, Suspending Tariffs, Setting Hearings and Directing Filings issued by the Missouri Public Service Commission ("Commission") in the above-captioned proceeding on March 12, 2008, Kansas City Power & Light Company ("KCPL") hereby applies to intervene and to become a party herein. In support thereof, KCPL states as follows:

1. KCPL is a Missouri corporation, in good standing, with its principal office and place of business located at 1201 Walnut, Kansas City, Missouri 64106. KCPL is engaged in the generation, transmission, distribution, and sale of electric energy and power in those areas in Missouri certificated to it by the Commission, including the City of Kansas City, Missouri, as well as in areas of eastern Kansas. KCPL is an "electrical corporation" and "public utility" as those terms are defined in Section 386.020, RSMo 2000¹, and, as such, is subject to the jurisdiction of the Commission as provided by law. KCPL provides electric service to approximately 230,000 residential customers and approximately 30,100 commercial and industrial customers in Missouri. KCPL's Certificate of Good Standing was filed with the Commission in Case No. EM-2000-464 and is incorporated herein by reference.

¹All statutory references are to Revised Statutes of Missouri 2000.

2. KCPL has no pending or final judgments or decisions against it from state or federal regulatory agencies or courts which involve customer service occurring within the three (3) years immediately preceding the filing of this application. KCPL has no overdue Commission annual reports or assessment fees.

3. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

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4. On March 11, 2008, Trigen-Kansas City Energy Corporation (“Trigen”) submitted tariffs designed to implement a general rate increase for steam service. Trigen indicates the new steam service rates are designed to increase its gross annual steam tariff revenues by approximately \$1,228,000. The submitted tariffs carry an effective date of April 11, 2008.

5. On March 12, 2008, the Commission issued its Order Directing Notice, Suspending Tariffs, Setting Hearings and Directing Filings, which directed that any entity wishing to intervene in this matter should file an application to intervene not later than April 1, 2008.

6. KCPL has a direct and pecuniary interest in this proceeding that is different from that of the general public. KCPL provides electricity in the same service area for which Trigen is providing steam services. It is therefore important to KCPL that Trigen's rates appropriately reflect its cost of service,.

7. For the above-stated reasons, KCPL's interest in this proceeding is different from that of the general public and cannot be represented by any other party to these proceedings. Actions taken by the Commission in this proceeding may substantially affect KCPL's legal interests.

8. KCPL's participation will aid the Commission in resolving the issues raised in this proceeding. Consequently, KCPL's intervention and participation will promote the public interest.

9. Since there is insufficient information currently available to identify all issues that may arise which will affect KCPL's interests, KCPL reserves its right to state its position and participate with regard to any matter or issue arising in this proceeding.

WHEREFORE, KCPL respectfully requests that the Commission issue an order authorizing it to intervene in the above-captioned matter.

Respectfully submitted,

/s/ Curtis D. Blanc

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ATTORNEY FOR
KANSAS CITY POWER & LIGHT COMPANY

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, this 1st day of April, 2008 to:

Office of the Public Counsel

P.O. Box 2230
Jefferson City, MO 65102

General Counsel

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/s/ *Curtis D. Blanc*

Curtis D. Blanc