

**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 Approval of the Merger) **Case No. EM-2007-0374**  
of Aquila, Inc., with a Subsidiary of Great Plains       )  
Energy Incorporated and for Other Related Relief        )

**APPLICATION TO INTERVENE**

COMES NOW the City of St. Joseph, Missouri (hereinafter referred to as "St. Joseph"), by and through counsel, and files its Application to Intervene in this case pursuant to Section 386.420 RSMo and 4 CSR 240-2.075. In support of this application, St. Joseph states as follows:

1. The City of St. Joseph, Missouri is a municipality of the State of Missouri located in Buchanan County. The principal place of business address for the City of St. Joseph is: City Hall, 1100 Frederick Avenue, St. Joseph, Missouri 64501.
2. All communications and pleadings in this case should be served on:

William D. Steinmeier  
WILLIAM D. STEINMEIER, P.C.  
2031 Tower Drive, P.O. Box 104595  
Jefferson City, MO 65110-4595  
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3. On April 4, 2007, Great Plains Energy Incorporated, Kansas City Power & Light Company, and Aquila, Inc., filed a Joint Application with the Commission requesting authority for a series of transactions whereby Aquila would become a direct, wholly-owned subsidiary of Great Plains Energy. On April 9, 2007, the Commission issued its *Order Directing Notice and Order Directing Filing* in this case, directing

that interested parties wishing to intervene must do so no later than April 30, 2007. Therefore, this Application to Intervene is timely.

4. Pursuant to 4 CSR 240-2.075 (4) (A), St. Joseph states that it is a large consumer of energy supplied by Aquila. As such, St. Joseph has an interest in this matter which is different from that of the general public and which may be adversely affected by a final order arising from this case.
5. Pursuant to 4 CSR 240-2.075 (4) (B), St. Joseph states that, as a governmental body representing the residents, commercial and civic interests of the City of St. Joseph, St. Joseph is also interested in the impact of any decisions in this proceeding on behalf of its citizens. Therefore, granting the instant Application to Intervene would serve the public interest.
6. Pursuant to 4 CSR 240-2.075 (2), St. Joseph states that it is currently unsure of the position(s) it will take in this matter.

WHEREFORE, the City of St. Joseph, Missouri, respectfully requests that the Missouri Public Service Commission grant its Application to Intervene in this matter and make St. Joseph a party to this proceeding for all purposes.

Respectfully submitted,

**/s/ William D. Steinmeier**

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COUNSEL FOR THE CITY OF ST.  
JOSEPH, MISSOURI

### **CERTIFICATE OF SERVICE**

I hereby certify that the undersigned has caused a complete copy of the attached document to be electronically filed and served on the Commission's Office of General Counsel (at [gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov)) and the Office of Public Counsel (at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)), and to be served electronically or by U.S. Mail on counsel of record, on this 27<sup>th</sup> day of April 2007.

/s/ William D. Steinmeier  
William D. Steinmeier