

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

In the Matter of the Application of Kansas City)
Power & Light Company for the Issuance of an)
Accounting Authority Order Relating to its) Case No. EU-2012-0130
Electrical Operations and for a Contingent Waiver)
of the Notice Requirement of 4 CSR 240-4.020(2))

**APPLICATION TO INTERVENE OF THE MISSOURI
JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION**

COMES NOW, the Missouri Joint Municipal Electric Utility Commission (“MJMEUC”), pursuant to Missouri Public Service Commission (“Commission”) rule 4 CSR 240-2.075, and files its Application to Intervene in the referenced case. In support thereof, MJMEUC states as follows:

1. On December 19, 2011 Kansas City Power & Light filed an application for an Accounting Authority Order to address issues caused by a coal shortage at Iatan 2, among other plants, in 2011 due to flooding of the Missouri River.
2. On December 20, 2011 the Commission established a deadline for interventions by January 9, 2012.
3. The MJMEUC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 et seq. RSMo., with authority to exercise public powers of a political subdivision of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MJMEUC.

4. MJMEUC owns a minority interest in the Iatan 2 plant, and was also impacted by the coal shortage caused by flooding of the Missouri River.
5. MJMEUC's position is unique among the parties currently in this case, and the interest of MJMEUC is not represented by any other party.
6. Communications in regard to this Application should be addressed to:

Douglas L. Healy
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939 Boonville, Suite A
Springfield, MO 65802
dhealy@mpua.org

WHEREFORE, MJMEUC prays that this Commission issue an order granting its application to intervene in this proceeding and for such other orders and relief as may be appropriate in the circumstances.

Respectfully Submitted,

By: /s/ Douglas L. Healy
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ATTORNEY FOR MJMEUC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing application to intervene was served by e-mailing a copy to all parties on the Commission's Service List this 9th day of January, 2012.

/s/ Douglas L. Healy
DOUGLAS L. HEALY