

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

In the Matter of the Resource Plan)
Plan of KCPL Greater Missouri)
Operations Company)

Case No. EO-2012-0324

**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 above referenced case. In support thereof, MJMEUC states as follows:

1. On April 9, 2012, Kansas City Power & Light Greater Missouri Operations (“KCPL-GMO”) filed its 2012 Integrated Resource Planning Filing (IRP), which is required by the Commission’s Integrated Resource Planning rule, 4 CSR 240-22.

2. On April 12, 2012, the Commission issued an Order setting a deadline of May 3, 2012 for applications to intervene in this matter.

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. Sixty-nine Missouri municipalities are current parties to the joint contract establishing the MJMEUC.

4. Communications in regard to this Application should be addressed to:

Douglas L. Healy
Healy & Healy, LLC
939 Boonville, Suite A
Springfield, MO 65802
doug@healylawoffices.com

5. MJMEUC serves 5 municipalities that currently have wholesale power contracts with KCPL-GMO and 7 municipalities directly embedded in KCPL-GMO's transmission system that take transmission service through the Southwest Power Pool ("SPP").

6. MJMEUC has an interest that is different from that of the general public, in that it represents the interest of municipal electrical systems throughout the state, as well as municipal electrical systems that take transmission through SPP and municipal electrical systems that have wholesale power contract with KCPL-GMO. Such interest is not currently represented in the proceedings.

7. Granting intervention to MJMEUC would serve the public interest by allowing MJMEUC's experience and insight to be part of the Integrated Resource Planning process.

8. MJMEUC does not have a position at this time in this case to the proposed Integrated Resource Plan.

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
Douglas L. Healy
Missouri Bar No. 51630
Healy & Healy, LLC
939 Boonville, Suite A
Springfield, Missouri 65802
Telephone: (417) 864-8800
Facsimile: (417) 869-6811
Email: dhealy@mpua.org

ATTORNEY FOR MJMEUC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing application to intervene was served via email to the following interested persons on this 2nd day of May, 2012:

Office of Public Counsel at: opcservice@ded.mo.gov;

General Counsel's Office at: gencounsel@psc.mo.gov;

Steve Dottheim at: steve.dottheim@psc.mo.gov;

Roger Steiner at: roger.steiner@kcpl.com;

Carl Lumley at: clumley@lawfirmemail.com;

Shelley A. Woods at: Shelley.woods@ago.mo.gov;

James Fischer at: jfischerpc@aol.com;

Mark Comley at: comleym@ncrpc.com

Jessica Blome at: Jessica.blome@ago.mo.gov

Mary Ann Young at: DNREnergycases@dnr.mo.gov

/s/ Douglas L. Healy
DOUGLAS L. HEALY