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

In the Matter of the Resource Plan	)	
Plan of Kansas City Power & Light	)	Case No. EO-2012-0323
Company	)	

# <u>APPLICATION TO INTERVENE OF THE</u> 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 ("KCPL") 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 1 municipality that currently has a wholesale power contract with KCPL and 5 municipalities directly embedded in KCPL'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. 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

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### **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  $2^{nd}$  day of May, 2012:

Office of Public Counsel at: <a href="mailto:opcservice@ded.mo.gov">opcservice@ded.mo.gov</a>;
General Counsel's Office at: <a href="mailto:gencounsel@psc.mo.gov">gencounsel@psc.mo.gov</a>;
Steve Dottheim at: <a href="mailto:steve.dottheim@psc.mo.gov">steve.dottheim@psc.mo.gov</a>;
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\_\_/s/ Douglas L. Healy\_ DOUGLAS L. HEALY