



Kansas City Power & Light®

Law Department

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February 20, 2003

FILED³

FEB 21 2003

**Missouri Public
Service Commission**

Mr. Dale Hardy Roberts
Secretary Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

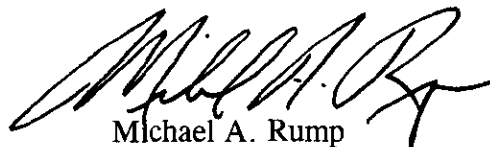
Re: In re: Application of Union Electric Company for Authority to Participate in the
Midwest ISO through a Contractual Relationship with GridAmerica
Case No. EO-2003-0271

Dear Mr. Roberts:

Enclosed for filing you will find the original and eight (8) copies of KCPL's Application to Intervene in the above-captioned matter.

Please bring this filing to the attention of the appropriate Commission personnel.

Very truly yours,



Michael A. Rump

c: Parties of Record

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

FILED³

FEB 21 2003

Missouri Public
Service Commission

In re: Application of Union Electric Company)	
For Authority to Participate in the Midwest)	
ISO through a Contractual Relationship)	Case No. EO-2003-0271
With GridAmerica)	

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

COMES NOW Kansas City Power & Light Company ("KCP&L") by and through its counsel and pursuant to 4 CSR 240-2.075 applies to intervene in the above-entitled matter. In support of its application, KCP&L alleges and states:

1. KCP&L is a corporation organized and existing under and by virtue of the laws of the State of Missouri, with its principal office at 1201 Walnut, Kansas City, Missouri 64106-2124. KCP&L's Certificate of Good Standing was provided in Case No. EF-2002-315 and is incorporated herein by reference.

2. KCP&L holds Certificates of Convenience and Necessity from the Commission to transact business as an electric public utility in certain areas of the State of Missouri and is principally engaged in the generation, transmission, distribution and sale of electric power and energy.

3. As an electric public utility owning and operating electric transmission facilities, KCP&L is also subject to the jurisdiction of the Federal Energy Regulatory Commission ("FERC").

4. Communications in this matter should be addressed to:

Timothy M. Rush
Director, Regulatory Affairs
Kansas City Power & Light Company
1201 Walnut
P.O. Box 418679
Kansas City, Missouri 64141-9679
Telephone: (816) 556-2344
Facsimile: (816) 556-2110
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5. KCP&L has heretofore filed with this Commission a certified copy of the Articles of Consolidation under which it was organized and of all amendments thereto.

6. KCP&L has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court, which involve customer service or rates, which has occurred within three (3) years of the date of this Application, except as identified on Exhibit 1 hereto. No annual report or assessment fees are overdue.

7. KCP&L requests leave to intervene in the above-entitled matter.

8. In consideration of Orders issued by and Rule Making proceedings pending at the FERC, KCP&L intends to join the Regional Transmission Organization ("RTO"), which will result from the merger of the Southwest Power Pool ("SPP") and the Midwest Independent Transmission System Operator ("MISO"). The RTO resulting from the merger of SPP and MISO is currently referred to as the "Resulting Company". KCP&L has prepared and submitted

to MISO a Conditional Membership Application concerning its membership in the Resulting Company. This Conditional Membership Application has not been accepted by MISO and is the subject of ongoing discussions between KCPL and MISO.

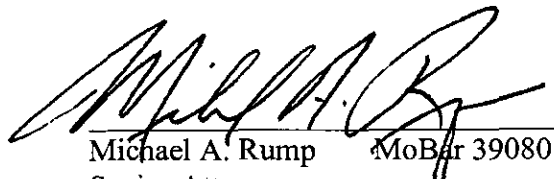
9. KCPL anticipates filing for State Commission and FERC approval of KCP&L's membership and transfer of functional control of KCP&L's transmission facilities to the Resulting Company after MISO accepts KCP&L's Conditional Membership Application.

10. As an electric public utility subject to the jurisdiction of both this Commission and FERC, KCP&L has an interest in this matter. Since KCP&L anticipates filing an application with the Commission to transfer functional control of its transmission facilities to the Resulting Company, after MISO accepts KCP&L's Conditional Membership Application, any action taken by the Commission in this matter may serve as precedent for KCP&L's application. Accordingly, KCP&L's interest in this proceeding is different from that of the general public and may be adversely affected by a final Commission Order in this matter.

11. Allowing KCPL to intervene in this matter will serve the public interest.

WHEREFORE, for the above and foregoing reasons, Kansas City Power & Light Company respectfully requests permission to intervene in the above-entitled matter.

Respectfully submitted,



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Attorney for KCPL

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing application of Kansas City Power & Light Company to intervene out of time was deposited in the U.S. Mail, postage prepaid, on the 20th day of February 2003, to:

Dana Joyce
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65101

John Coffman
Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

David B. Hennen
1901 Chouteau Ave.
P.O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149

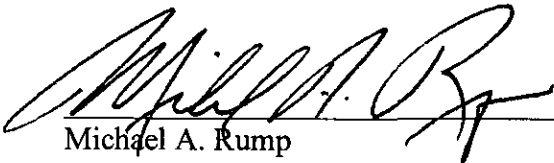

Michael A. Rump

EXHIBIT 1

The following is a list of Applicant's pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this application:

1. GST Appeal of Missouri Public Service Commission Decision; Case No. EC-99-553 in the Circuit Court of Cole County, Missouri; Docket No. 00CV324891; further appealed to the Court of Appeals of the Western District of Missouri by GST.
2. Hawthorn Station Incident Investigation before the Missouri Public Service Commission; Case No. ES-99-581.
3. Maintaining Wolf Creek Decommissioning Payments at current rates - Case No. EO-2003-0081
4. Variance of existing tariff rules – Case No. EE-2003-0199