

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

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| In the Matter of Kansas City Power & Light |) | |
| Greater Missouri Operations Company's 2018 Triennial |) | Case No. EO-2018-0269 |
| Compliance Filing Pursuant to 4 CSR 240-22. |) | |

APPLICATION TO INTERVENE
OF THE MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION

COMES NOW the Missouri Joint Municipal Electric Utility Commission ("MJMEUC"), by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully files its Application to Intervene in this matter. In support of this Application, MJMEUC states as follows:

1. On April 4, 2018, the Commission issued its Order Directing Notice and Setting Deadline for Submission of Intervention Requests, in which it set April 25, 2018 as the deadline for intervention in this docket.

2. 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-eight Missouri municipalities are current parties to the joint contract establishing the MJMEUC.

3. Correspondence, communications, orders and the decision in this matter should be addressed to:

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4. MJMEUC serves five municipalities that currently have wholesale power contracts with Kansas City Power & Light Greater Missouri Operations Company (GMO) and seven municipalities directly imbedded in GMO's transmission system that take transmission through the Southwest Power Pool (SPP).

5. MJMEUC is one of five owners, along with GMO, of the Iatan 2 Generating Plant ("Iatan 2") located at the Iatan Generating Station in Platte County, Missouri.

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 electric systems directly imbedded in GMO's transmission system that take transmission through SPP and municipal electrical systems that have wholesale power contracts with GMO. MJMEUC also has interests in the Iatan-2 generating plan co-owned with GMO. MJMEUC and its members have direct and immediate interests in this proceeding that are not currently represented in this matter.

7. Granting intervention to MJMEUC would serve the public interest by allowing MJMEUC's experience and insight to be a 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 but reserves the right to take positions on specific issues as this case proceeds.

WHEREFORE, MJMEUC respectfully requests that the Commission grant its Application to Intervene on its behalf and on behalf of its members, entitling it to fully participate in this proceeding.

Respectfully submitted,

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Dated: April 24, 2018

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 24th day of April, 2018.



Terry M. Jarrett