

City of Independence

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www.ci.independence.mo.us • (816) 325-7000



April 27, 2007

FILED²

APR 30 2007

Mr. Kevin Thompson
Public Counsel
Missouri Public Service Commission Counsel
Governor Office Building
200 Madison Street, First Floor
Jefferson City, MO 65102-2230

Missouri Public
Service Commission

Dear Mr. Thompson:

Please find enclosed an original plus eight copies of an Application to Intervene and Comments of the City of Independence along with an original and eight copies of a Motion for Leave to Appear Pro Hac Vice. A check for \$200 has been enclosed to cover filing fees. Should you have any questions please contact Dayla Bishop-Schwartz in my office at 816-325-7217.

Sincerely,

A handwritten signature in dark ink, appearing to read "Allen Garner", is written over a horizontal line.

Allen Garner
City Counselor

BAG/rr

Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

APR 30 2007

Missouri Public
Service Commission

In the matter of the Joint Application)
of Great Plains Energy Inc., Kansas)
City Power & Light Company, and)
Aquila, Inc. for Approval of the Merger) Case No. EM-2007-0374
of Aquila, Inc. with a Subsidiary of)
Great Plains Energy Inc. and for Other)
Related Relief)

MOTION FOR LEAVE TO APPEAR *PRO HAC VICE*

COME NOW, Alan I. Robbins and Debra D. Roby, special counsel to the City of Independence, Missouri ("City"), and Mr. Allen Garner, City Counselor, and Ms. Dayla Bishop Schwartz, Assistant City Counselor, to respectfully petition the Commission for leave to permit Mr. Robbins and Ms. Roby to appear *pro hac vice* on behalf of the City, pursuant to Rule 4 CSR 240-2.040(3)(C) of the Commission's Rules and Rules 6.01(m) and 9.03 of the Missouri Supreme Court Rules. In support of this Motion, the City states:

1. Mr. Robbins is not admitted to practice in the State of Missouri. Mr. Robbins is a member in good standing of the Bar of the District of Columbia, the United States District Court for the District of Columbia, the United States Court of Appeals for the District of Columbia Circuit and the United States Supreme Court. Mr. Robbins is also a non-resident member of the New York State Bar.

2. Mr. Robbins represents that he will comply with the Rules of Professional Conduct as set forth in Rule 4 and become subject to discipline by the courts of Missouri.

3. Ms. Roby is not admitted to practice in the State of Missouri. Ms. Roby is a member in good standing of the Bar of the District of Columbia and the United States Court of Appeals for the District of Columbia Circuit.

4. Ms. Roby represents that she will comply with the Rules of Professional Conduct as set forth in Rule 4 and become subject to discipline by the courts of Missouri.

5. Neither Mr. Robbins nor Ms. Roby have ever been disbarred, disciplined or suspended by a court of record or by a state bar association.

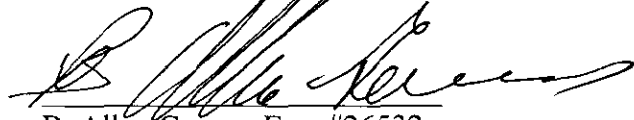
6. A fee in the amount of \$100 per attorney (or a total of \$200) is being filed concurrently with this Motion, as required by Rules 6.01(m) and 9.03 of the Missouri Supreme Court Rules.

7. Pursuant to Rule 9.03(c) of the Missouri Supreme Court Rules, Mr. Allen Garner, City Counselor, and Ms. Dayla Bishop Schwartz, Assistant City Counselor for the City of Independence, Missouri, shall be designated local counsel.

WHEREFORE, for the foregoing reasons, the City respectfully requests that the Commission enter an Order granting Mr. Robbins and Ms. Roby leave to appear *pro hac vice* for the purposes of representing the City in the captioned proceeding.

Dated this 30th day of April, 2007.

Respectfully submitted,



B. Allen Garner, Esq. #26532

City Counselor

Dayla Bishop Schwartz, Esq. #31399

Assistant City Counselor

Law Department

City of Independence

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**CERTIFICATE OF SERVICE OF
MOTION FOR LEAVE TO APPEAR *PRO HAC VICE***

The undersigned certifies that a true and correct copy of the CITY OF INDEPENDENCE MOTION FOR LEAVE TO APPEAR *PRO HAC VICE* was served by U.S. Mail, postage prepaid, this 22nd day of April, 2007 to:

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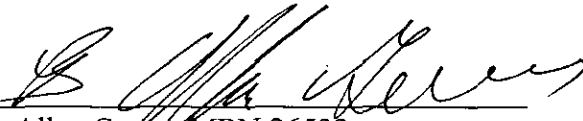
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Respectfully submitted,

CITY OF INDEPENDENCE, MISSOURI

By 
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ATTORNEY FOR PLAINTIFF