

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

In the Matter of the Joint Application of Great    )  
Plains Energy Incorporated, Kansas City         )  
Power & Light Company, and Aquila, Inc. for     )  
Approval of the Merger of Aquila, Inc. with a     )  
Subsidiary of Great Plains Energy Incorporated) )  
And for Other Related Relief.                     )

**Case No. EM-2007-0374**

**APPLICATION TO INTERVENE OF  
SOUTH HARPER RESIDENTS**

COMES NOW Frank Dillon, Kimberly Miller, James E. Doll, Randy Cooper, Gary Crabtree, Eric Thompson, and Allen Bockelman (hereinafter collectively as “South Harper Residents”), by and through counsel, pursuant to 4 CSR 240-2.075, and respectfully apply for intervention as parties to the above-styled proceeding, initiated by a March 30, 2007 Joint Application (“Joint Application”), relating to a proposed merger whereby Aquila, Inc. (“Aquila”) would become a wholly-owned subsidiary of Great Plains Energy Incorporated (“GPE”).

In support of this Application to Intervene, the South Harper Residents state as follows:

1. Frank Dillon, Kimberly Miller, James E. Doll, Randy Cooper, Gary Crabtree, and Eric Thompson each reside on property adjacent to or in very close proximity to an electrical peaking facility (commonly known as the “South Harper Facility” or the “South Harper Power Plant”). Allen Bockelman resides on property adjacent to a related electric substation (commonly known as the “Peculiar Substation”).

2. Both the South Harper Power Plant and the Peculiar Substation are part of a project (collectively, the “South Harper Project”) which has been the subject of certain Commission cases to which the South Harper Residents participated, including Case No. EA-2006-0309 (currently pending appeal in the Western District Court of Appeals). The South Harper Project is currently subject to a Cass County Circuit Court injunction because it was built in violation of local zoning restrictions. In addition, each of the South Harper Residents has pending civil court claims against Aquila with regard to the significant loss in value to their property and the ongoing nuisances related to the construction and operation of the South Harper Project facilities in close proximity to their respective properties.

3. The interests and claims of the South Harper Residents could be adversely impacted by the details of the proposed merger or by the decisions reached by the Commission in this case. The interests and claims of the South Harper Residents are different from the interests of the general public and cannot be adequately represented by any other party. It would serve the public interest to allow their intervention in this matter.

4. Correspondence, communications, orders and any decision in this matter should be addressed to:

John B. Coffman  
Attorney at Law  
871 Tuxedo Blvd.  
St. Louis, MO 63119-2044  
Ph: (573) 424-6779  
E-mail: [john@johncoffman.net](mailto:john@johncoffman.net)

and

Matthew Uhrig  
Lake Law Firm  
3401 Truman Blvd.  
Jefferson City, MO 65109  
Ph: (573) 761-4795  
Fax: (573) 761-4220  
E-mail: [muhrig\\_lakelaw@earthlink.net](mailto:muhrig_lakelaw@earthlink.net)

5. Certain details of the proposed merger and related transactions are either currently designated as Highly Confidential (and thus unavailable for undersigned counsel to review) or have not yet otherwise been made public. Therefore, the South Harper Residents take no position at this time as to whether the proposed merger is detrimental to the public interest. A more detailed position statement may be forthcoming based on a review of such details.

WHEREFORE, the South Harper Residents respectfully request that the Commission grant their Application to Intervene, entitling them to fully participate as a party to this proceeding.

Respectfully submitted,

/s/ John B. Coffman

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John B. Coffman MBE #36591  
Attorney at Law  
871 Tuxedo Blvd.  
St. Louis, MO 63119-2044  
Ph: (573) 424-6779  
E-mail: [john@johncoffman.net](mailto:john@johncoffman.net)

and

Matthew Uhrig  
Lake Law Firm  
3401 West Truman Blvd.  
Jefferson City, MO 65109  
Ph: (573) 761-4790  
Fax: (573) 761-4220  
E-mail: [muhrig\\_lakelaw@earthlink.net](mailto:muhrig_lakelaw@earthlink.net)

Attorneys for South Harper Residents (Frank  
Dillon, Kimberly Miller, James E. Doll, Randy  
Cooper, Gary Crabtree, Eric Thompson, and  
Allen Bockelman)

## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 30<sup>th</sup> day of April 2007:

General Counsel's Office  
Missouri Public Service Commission  
P O Box 360  
Jefferson City MO 65102

**James C. Swearengen**  
Brydon Swearengen & England  
P.O. Box 456  
Jefferson City, MO 65102

**James M. Fischer**  
Fischer & Dority, P.C.  
101 Madison St., Suite 400  
Jefferson City, MO 65101

Office of the Public Counsel  
P.O. Box 2230  
Jefferson City, MO 65102

**Karl Zobrist**  
Sonnenschein Nath & Rosenthal  
4520 Main St., Suite 1100  
Kansas City, MO 64111

*/s/ John B. Coffman*

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John B. Coffman