

In the Matter of Great Plains Energy Incorporated for)
Approval of its Acquisition of Westar Energy, Inc.) Case No. EM-2017-0226

APPLICATION TO INTERVENE
BY 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 applies for intervention as a party in this matter. In support of this Application, MJMEUC states as follows:

1. On February 24, 2017, the Commission issued its Order Directing Notice, Setting Deadlines, and Scheduling Procedural Conference in this docket, in which it set March 2, 2017 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:

Douglas L. Healy
Terry M. Jarrett
Peggy A. Whipple
Healy Law Offices, LLC
514 E. High St., Suite 22
Jefferson City, MO 65101
Telephone: (573) 415-8379

Facsimile: (573) 415-8379
Email: doug@healylawoffices.com
terry@healylawoffices.com
peggy@healylawoffices.com

4. The Applicant Great Plains Energy Incorporated (“GPE”) is a Missouri corporation, and the holding company for the stock of Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”), both regulated public utilities in Missouri.

5. MJMEUC serves five municipalities that currently have wholesale power contracts with GMO and seven municipalities directly imbedded in GMO’s transmission system that take transmission through the Southwest Power Pool (SPP).

6. MJMEUC is one of five owners, along with KCP&L and GMO, of the Iatan 2 Generating Plant (“Iatan 2”) located at the Iatan Generating Station in Platte County, Missouri. Iatan 2 is an 850 MW super-critical, coal-fired power plant with state-of-the-art environmental controls. Iatan 2 became operational on December 31, 2010. The owners and ownership shares of Iatan 2 are as follows:

- a. KCP&L: 54.71%
- b. GMO: 18.00%
- c. Empire District Electric Company (“Empire”): 17.00%
- d. MJMEUC: 11.76%
- e. Kansas Electric Power Cooperative (“KEPCo”): 3.53%

7. 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 KCP&L and GMO. MJMEUC and its members have direct and immediate interests in this proceeding that are not currently represented in this matter.

8. MJMEUC believes that its intervention and participation in this proceeding would serve the public interest by clarifying the issues under consideration, ensuring completeness of the record, and assisting the Commission in its decision-making in this case, and wishes to become a party to this case for all purposes.

9. MJMEUC does not yet have a position on the issues in this case and 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,

HEALY LAW OFFICES, LLC



Douglas L. Healy MO Bar 51630
Terry M. Jarrett MO Bar 45663
Peggy A. Whipple MO Bar 54758
514 E. High St., Suite 22
Jefferson City, MO 65101
Telephone: (573) 415-8379
Facsimile: (573) 415-8379
Email: doug@healylawoffices.com
terry@healylawoffices.com
peggy@healylawoffices.com

Dated: March 1, 2017

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 1st day of March, 2017.

A handwritten signature in black ink, reading "Terry M. Jarrett". The signature is written in a cursive style with a large, stylized "T" and "J".

Terry M. Jarrett