

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

In the Matter of Kansas City Power & Light	)	
Company's Request for Authority to Implement	)	Case No. ER-2014-0370
A General Rate Increase for Electric Service	)	

**APPLICATION TO INTERVENE OF  
THE UNITED STATES DEPARTMENT OF ENERGY  
AND THE FEDERAL EXECUTIVE AGENCIES**

The United States Department of Energy ("DOE") on behalf of themselves and all other affected Federal Executive Agencies ("FEA") and, in accordance with 4 C.S.R. 240-2.075 and the Commission's October 31, 2014 *Order Directing Notice, Setting Intervention Deadline, and Setting Procedural Conference*, files this application to intervene and be accorded full party status. For this application, DOE respectfully states as follows:

1. A General Services Administration delegation of authority under 49 U.S.C. § 481(a)(4) empowers DOE to represent all Federal Executive Agencies located in Kansas City Power & Light Company's ("KCPL") service territory.

2. DOE operates at the Bannister Federal Complex ("Bannister"), an industrial facility located in Kansas City, Missouri. In recent years, some of the operations at Bannister have relocated, however it is estimated that in fiscal year 2015 the facility will consume approximately 30,000,000 kWhs of electric power, at a cost of approximately \$2 million. For this reason, DOE interests are different than those of the general public and may be materially and substantially affected by the KCPL request that is the subject of the present proceeding. The interests of other FEA facilities within the KCPL service territory may also be materially and substantially affected by the KCPL request.

3. DOE has not yet ascertained the positions that it will take in this case.

4. The intervention of DOE on behalf of DOE and all other FEA will serve the public interest by assisting the Commission's record for decision in this case.

5. The undersigned DOE attorney, Steven A. Porter, is not admitted to practice before the courts of the State of Missouri, and is admitted to practice before the courts of the state of Texas. Mr. Porter has been in the active practice of law since 1981. Mr. Porter is not under suspension or disbarment by any of the courts of the state in which he is admitted to practice. Mr. Porter will in the future petition for leave to appear *pro hac vice* herein. DOE respectfully requests that this application be granted, pending completion and approval of that petition.

6. DOE respectfully requests that it be allowed to participate via telephone in the prehearing conference scheduled to take place on Monday November 24, 2014.

7. Correspondence, communications, and all other materials regarding this application, including all Commission notices, decisions, and orders, should be addressed to.

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WHEREFORE, DOE respectfully requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully submitted this 20th day of November, 2014.



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on this 20<sup>th</sup> day of November, 2014, the foregoing pleading was:

- (1) formally placed on the Commission's website via the Commission's Electronic Filing and Information System ("EFIS") in accordance with applicable procedure; and
- (2) served via electronic mail on all of the entities and individuals, and all of the legal representatives of all of the entities and individuals, including Commission Staff, whom the EFIS at this date identifies as parties or petitioners for intervention herein.



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