

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

In the Matter of KCP&L Greater Missouri Operations)
Application for Authority to Establish a Demand-) File No. EO-2019-0133
Side Programs Investment Mechanism) Tariff No. YE-2019-0105

APPLICATION TO INTERVENE

COMES NOW the City of St. Joseph, Missouri, by and through counsel, and files its Application to Intervene in this case pursuant to Section 386.420, RSMo, and 4 CSR 240-2.075. In support of this application, St. Joseph states as follows:

1. The City of St. Joseph, Missouri is a municipality of the State of Missouri located in Buchanan County. The principal place of business address for the City of St. Joseph is: City Hall, 1100 Frederick Avenue, St. Joseph, Missouri 64501.
2. All communications and pleadings in this case should be served on:

William D. Steinmeier
WILLIAM D. STEINMEIER, P.C.
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3. On December 4, 2018, the Commission issued its *Order Directing Notice of Application and Order Setting Hearing* in this case, establishing December 19, 2018 as the deadline for applications to intervene. Thus, the instant Application to Intervene is timely.
4. The City of St. Joseph is a large consumer of electricity service supplied by KCP&L Greater Missouri Operations Company and could

be affected by the decision(s) of the Commission in this case. The City is also a governmental body representing the residents and commercial interests of the City. For each of these reasons, the City of St. Joseph has an interest in this case which is different from that of the general public and which may be adversely affected by a final order arising out of this case. Granting the instant Application to Intervene would serve the public interest.

5. The City of St. Joseph is unsure of the position(s) it will take in this matter.

WHEREFORE, the City of St. Joseph, Missouri respectfully requests that the Missouri Public Service Commission grant this Application to Intervene and make St. Joseph a party to these proceedings.

Respectfully submitted,

/s/ William D. Steinmeier

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COUNSEL FOR THE CITY OF
ST. JOSEPH, MISSOURI

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the PSC Staff Counsel's office (at staffcounsel@psc.mo.gov), on the Office of the Public Counsel (at opc@ded.mo.gov) and on all parties of record on this 19th day of December 2018.

/s/ William D. Steinmeier

William D. Steinmeier