

  
GREAT PLAINS ENERGY

FILED<sup>3</sup>

JUN 27 2003

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Missouri Public  
Service Commission

June 26, 2003

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
200 Madison Street  
Jefferson City, Missouri 65102

Re: In the Matter of the Application by Aquila, Inc.  
For Authority to Assign, Transfer, Mortgage or  
Encumber Its Franchise, Works or System

Case No. EF-2003-0465

Dear Mr. Roberts:

I have enclosed for filing the original and eight copies of Kansas City Power & Light Company's Application to Intervene in the above-referenced case.

Please bring this filing to the attention of the appropriate Commission personnel.

Sincerely,

  
CAROL SIVILS  
Legal Assistant

enclosures

Dana K. Joyce  
John Coffman  
Paul Boudreau

**FILED<sup>3</sup>**

JUN 27 2003

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

**Missouri Public  
Service Commission**

In the Matter of the Application by Aquila, Inc. )  
for Authority to Assign, Transfer, Mortgage or )  
Encumber Its Franchise, Works or System )

Case No. EF-2003-0465

**APPLICATION OF  
KANSAS CITY POWER & LIGHT COMPANY  
TO INTERVENE**

COMES NOW Kansas City Power & Light Company ("KCPL") by and through its counsel and pursuant to 4 CSR 240-2.075 applies to intervene in the above-entitled matter. In support of its application, KCPL alleges and states:

1. KCPL is a corporation organized and existing under and by virtue of the laws of the State of Missouri, with its principal office at 1201 Walnut, Kansas City, Missouri 64106-2124. KCPL's Certificate of Good Standing was provided in Case No. EF-2002-315 and is incorporated herein by reference.
2. KCPL holds Certificates of Convenience and Necessity from the Commission to transact business as an electric public utility in certain areas of the State of Missouri and is principally engaged in the generation, transmission, distribution and sale of electric power and energy.
3. Communications in this matter should be addressed to:

Tim M. Rush  
Director Regulatory Affairs  
Kansas City Power & Light Company  
1201 Walnut  
Kansas City, Missouri 64106-2124  
Telephone: (816) 556-2344  
Facsimile: (816) 556-2110  
Email: [tim.rush@kcpl.com](mailto:tim.rush@kcpl.com)

Michael A. Rump  
Senior Attorney  
Great Plains Energy Services  
1201 Walnut  
Kansas City, Missouri 64106-2124  
Telephone: (816) 556-2483  
Telecopy: (816) 556-2787  
Email: [mike.rump@kcpl.com](mailto:mike.rump@kcpl.com)

4. KCPL has heretofore filed with this Commission a certified copy of the Articles of Consolidation under which it was organized and of all amendments thereto.

5. KCPL has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court, which involve customer service or rates, which has occurred within three (3) years of the date of this Application, except as identified on Exhibit 1 hereto. No annual report or assessment fees are overdue.

6. On April 30, 2003, Aquila applied for permission to mortgage certain assets. The Commission, by Order dated June 12, 2003, set an intervention deadline in this proceeding of June 27, 2003.

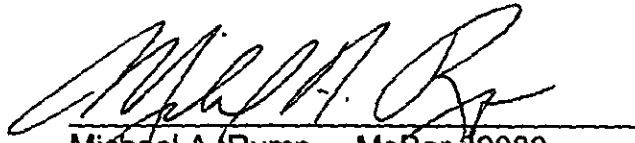
7. As an electric public utility subject to the jurisdiction of this Commission, KCPL has an interest in this matter. Accordingly, KCPL's interest in this proceeding is different from that of the general public and may be affected by a final Commission Order in this matter.

8. KCPL requests leave to intervene in the above-entitled matter.

9. Pursuant to 4 CSR 240-2.075(2), KCPL states that it currently neither supports nor opposes the relief sought by Aquila because it does not know at this time, whether any of its interests would be adversely affected if Aquila's application were granted as filed.

WHEREFORE, for the above and foregoing reasons, KCPL respectfully requests permission to intervene in the above-entitled matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael A. Rump", is written over a horizontal line.

Michael A. Rump MoBar 89080  
Senior Attorney  
Great Plains Energy Services  
1201 Walnut  
Kansas City, Missouri 64106-2124  
Telephone: (816) 556-2483  
Telecopy: (816) 556-2787

Attorney for  
Kansas City Power & Light Company

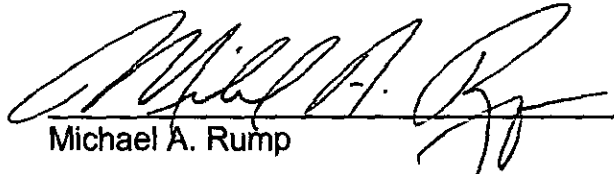
**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing application of Kansas City Power & Light Company to intervene was deposited in the U.S. Mail, postage prepaid, on the 26TH day of June, 2003, to:

Dana Joyce  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, Missouri 65101

John Coffman  
Office of the Public Counsel  
P. O. Box 7800  
Jefferson City, Missouri 65101

Paul Boudreau  
Brydon, Swearingen & England  
312 East Capitol  
P.O. Box 456  
Jefferson City, Missouri 65102

  
Michael A. Rump

### **EXHIBIT 1**

The following is a list of Applicant's pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this application:

1. GST Appeal of Missouri Public Service Commission Decision; Case No. EC-99-553 in the Circuit Court of Cole County, Missouri; Docket No. 00CV324891; further appealed to the Court of Appeals of the Western District of Missouri by GST.
2. Hawthorn Station Incident Investigation before the Missouri Public Service Commission; Case No. ES-99-581.
3. Application for a variance from separate metering requirements for Bishop Spencer Place, Case No. EE-2003-0282.