

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

In the Matter of Great Plains Energy Incorporated for)
Approval of its Acquisition of Westar Energy, Inc.) EM-2017-0226

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

The United States Department of Energy (“DOE” or “the Department”) 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 Missouri Public Service Commission’s (“PSC” or “Commission”) February 24, 2017 *Order Directing Notice, Setting Deadlines Date, and Scheduling Procedural Conference*, files this application to intervene and be accorded full party status. For this application, DOE respectfully states as follows:

1. The Department has been delegated the authority to represent all FEA located in Kansas City Power & Light Company’s (“KCP&L”) service territory. The U.S. Air Force (“USAF”) has been delegated authority to represent all FEA in the Greater Missouri Operations Company’s (“GMO”) service territory.
2. The Department 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 to a new national security campus served by GMO. It is estimated that in fiscal year 2017, the Bannister facility will consume electric power at a cost of approximately \$2.5 million. As federal facilities move to the new national security site, consumption in GMO’s service territory will increase. For this reason, Department interests are different from those of the general public and may be materially and substantially affected by Great Plains Energy’s (“GPE”) merger request that is the subject of the present proceeding. The interests of other FEA

facilities may also be materially and substantially affected by the GPE request. The resolution of this merger proceeding is likely to have a substantial impact on retail rates with KCP&L's and GMO's service territories.

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

4. The intervention of the Department 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, Rishi Garg, has appeared before the Missouri Public Service Commission in docket no. ER-16-0285. Mr. Garg is also admitted to practice before the courts in the State of Illinois and the District of Columbia. Mr. Garg has been in active practice of the law since 2003. Mr. Garg is not under suspension or disbarment by any of the courts of the state in which he is admitted to practice. Mr. Garg will in the future petition for leave to appear *pro hac vice* herein. The Department respectfully requests that this application be granted, pending completion and approval of that petition.

6. The Department respectfully requests that it be allowed to participate via telephone in the scheduling conference set to take place on Thursday, March 2nd, 2017, pursuant to the Commission's February 24, 2017 *Order Directing Notice, Setting Deadlines Date, and Scheduling Procedural Conference* and March 1, 2017 *Notice of Call-in Number for Procedural Conference*.

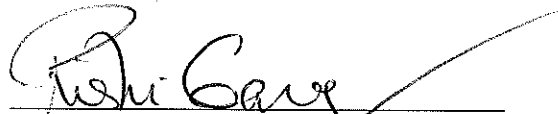
7. Correspondence, communications and all other materials regarding this application including all Commission notices, decisions and orders should be addressed to:

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

Respectfully submitted on this 2nd, day of March 2017.

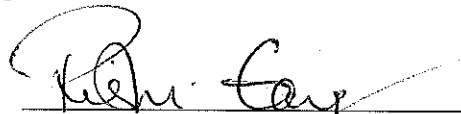


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 2nd day of March, 2017, 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.



Rishi Garg
United States Department of Energy