

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

In the Matter of the Application of Kansas City)
Power & Light Company and KCP&L Greater)
Missouri Operations Company for the Issuance)
Of an Accounting Authority Order Relating to) File No. EU-2014-0077
Their Electrical Operations and for a Contingent)
Waiver of the Notice Requirement of)
4 CSR 240-4.020(2))

EMPIRE’S APPLICATION TO INTERVENE

COMES NOW The Empire District Electric Company (Empire), and, pursuant to Missouri Public Service Commission (Commission) Rule 4 CSR 240-2.075, and the Commission’s Order Directing Notice, Establishing a Deadline for Filing Requests to Intervene and Setting Pre-Hearing Conference, states as follows:

1. Empire is a Kansas corporation with its principal office and place of business at 602 South Joplin Avenue (P.O. Box 127), Joplin, Missouri 64801 (64802). Empire is engaged in the business of providing electric and water utility services in Missouri to customers in its service areas and has a certificate of service authority to provide certain telecommunications services.

2. Empire is an “electrical corporation,” a “water corporation,” a “telecommunications company” and a “public utility” as those terms are defined in Section 386.020 RSMo, and is subject to the jurisdiction and supervision of the Commission as provided by law. Empire also has a wholly owned subsidiary that is a “gas corporation.”

3. Empire has no pending or final judgments or decisions against it from state or federal regulatory agencies or courts which involve customer service occurring within the three (3) years immediately proceeding the filing of this application. Empire has no overdue Commission annual reports or assessment fees.

4. Empire's documents of incorporation were filed with the Commission in Case No. EF-94-39 and said documents are incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G). A Certificate of Authority from the Missouri Secretary of State to the effect that Empire, a foreign corporation, is authorized to do business in the State of Missouri, was filed with the Commission in Case No. EM-2000-369 and is also incorporated by reference.

5. Pleadings, notices, orders and other correspondence and communications concerning this application should be addressed to the undersigned counsel and:

Ms. Kelly Walters
The Empire District Electric Company
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6. On September 20, 2013, Kansas City Power & Light Company (KCP&L) and KCP&L Greater Missouri Operations Company (GMO) filed an application for an Accounting Authority Order that would allow the Companies to undertake certain accounting procedures in connection with transmission costs associated with the Southwest Power Pool (SPP).

7. On September 23, 2013, the Commission issued an Order Directing Notice, Establishing a Deadline for Filing Requests to Intervene and Setting Pre-Hearing Conference. The Order, among other things, directed that application to intervene be filed by October 2, 2013. It also directed that a copy of the Order upon each party to File No. ER-2012-0174 and ER-2012-0175 (KCPL and GMO's last general rate cases). Empire was a party to Files Nos. ER-2012-0174 and ER-2012-0175.

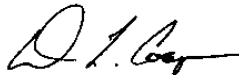
8. Like KCPL and GMO, Empire has transferred functional control of certain transmission assets to SPP. Empire has recently obtained the Commission's authority to extend

its participation in SPP in Commission File No. EO-2012-0269. Accordingly, Empire has similar concerns to those identified in the Application in this case and is interested in the issues raised by KCPL and GMO, as they may have some implication for Empire.

9. For the reasons stated above, Empire has an interest which is different from that of the general public and which may be adversely affected by a final order arising from the case. Additionally, Empire's status as a public utility and its interests in the subjects of this case indicate that its intervention would serve the public interest.

WHEREFORE, Empire prays that the Commission issue its order granting it permission to intervene in the above-captioned matter.

Respectfully submitted,



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ATTORNEYS FOR THE EMPIRE DISTRICT
ELECTRIC COMPANY

CERTIFICATE OF SERVICE

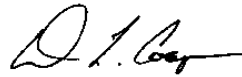
The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on September 27, 2013, to the following:

Steve Dottheim/Nathan Williams
Office of the General Counsel
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Roger W. Steiner
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James M. Fischer
Fischer & Dority, P.C.
Email: jfischerpc@aol.com



VERIFICATION

STATE OF MISSOURI)
) SS
COUNTY OF JASPER)

I, W. Scott Keith, state that I am employed by The Empire District Electric Company ("Empire") as Director of Planning and Regulatory; that I have read the attached document; that the statements contained therein are true and correct to the best of my information, knowledge and belief; and, that I am authorized to make this statement on behalf of Empire.

W. Scott Keith

Subscribed and sworn to before me this 27th day of September, 2013.

Angela M. Cloven
Notary Public

My Commission Expires:

11/01/15

