

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

In the Matter of the Application of Great Plains)
Energy Incorporated for Approval of its Merger) Case No. EM-2018-0012
with Westar Energy, Inc.)

APPLICATION TO INTERVENE BY THE CITY OF INDEPENDENCE, MISSOURI

Pursuant to Commission Rule 4 CSR 240-2.075, the City of Independence, Missouri (“the City”), by and through counsel, respectfully applies for intervention as a party in this matter. In support of this application, the City states as follows:

1. On August 31, 2017, Westar Energy, Inc. (“Westar”), Great Plains Energy Incorporated (“Great Plains”), Kansas City Power and Light Company (“KCP&L”), and KCP&L Greater Missouri Operations Company (“GMO”) submitted their application to this Commission seeking approval of the proposed merger between Westar and Great Plains, the parent company of KCP&L and GMO (both regulated public utilities in Missouri). Westar and Great Plains will merge through formation of a new holding company and the exchange of stock by shareholders of both Westar and Great Plains.
2. The City owns and operates a municipal electric utility, Independence Power and Light (“IPL”), which was established in 1901 to provide the residents and businesses of Independence, Missouri with safe, reliable, and affordable electric service.
3. The City serves more than 55,000 customers. The City maintains and operates several generating units, substations, and more than 650 miles of electric distribution and transmission lines. Some of the electric energy required to meet customer demand is

generated by the City, but the City acquires much of the power and energy needed to meet its customers' demand from resources and suppliers that are outside of the City.

4. The City has direct physical interconnections with KCP&L and GMO. The City also has a long-term Power Purchase Agreement (“PPA”) with The Missouri Joint Municipal Electric Utility Commission (“MJMEUC”), of which the City is a member. This PPA provides IPL with capacity and energy totaling 5.88% of KCP&L’s 881 MW (Nominal) Iatan-2 Generating unit, amounting to 14% of IPL’s Accredited Capacity (52 MW) and 32% of IPL’s annual customer load (MWhs). In addition, IPL is a joint owner in the Dogwood Combined Cycle Generating Facility located in GMO’s transmission system. This ownership share of Dogwood provides 75 MW of Accredited Capacity (20% of IPL’s total Accredited Capacity) and is a significant source of IPL energy. As such, IPL is subject to the availability of GMO’s transmission system. IPL also has long-term PPAs for capacity and energy from Omaha Public Power District’s Nebraska City-2 generating unit (Southeast Nebraska), the Smoky Hills II Wind farm (Central Kansas), and the Marshall Wind Farm (Northeast Kansas). All of these PPAs rely on transmission through GMO, KCP&L, and/or Westar transmission facilities. The City is also a retail customer of KCP&L. KCP&L provides retail electric service to the City's Courtney Bend Water Treatment Plant, which is located outside of the City's corporate limits. KCP&L also provides electric service to a large retail customer located within the City (the Lake City Army Ammunitions Plant).
5. The City has direct and immediate interests in this proceeding that cannot be adequately represented by any other party. As is evident from the foregoing summary of arrangements, the City has power purchase agreements with the joint applicants, is a

retail customer of KCP&L in connection with the City's water treatment plant, has physical interconnections with the joint applicants, has interests in KCP&L's Iatan-2 generating unit, and is dependent on the transmission systems of the joint applicants for transmission service from the described sources and to access other third party wholesale suppliers and generating resources. The City's primary electrical access to the rest of the country is by way of its interconnections with the joint applicants.

6. Correspondence and communications, including service of all notices and orders of this Commission, and pleadings in this proceeding, should be addressed to:

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WHEREFORE, the City respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,



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Dated: September 27, 2017

* Ms. Roby is listed as counsel subject to Commission action on her respective Motion for Admission Pro Hac Vice, which is being filed simultaneously herewith.

CERTIFICATE OF SERVICE

I hereby certify that I have caused copies of the foregoing to be mailed, emailed or hand-delivered to all parties listed on the official service list on this 27th day of September, 2017.

/s/ Debra D. Roby _____

Debra D. Roby