

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

In the Matter of KCP&L Greater Missouri)	
Operations Company's Request for Authority)	File No. ER-2016-0156
to Implement a General Rate Increase for)	
Electric Service)	Tracking No.
)	YE-2016-0223

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:

Bryan Carter
City Attorney
City Hall, Room 307
1100 Frederick Avenue
St. Joseph, MO 64501
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and

William D. Steinmeier
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3. On February 23, 2016, KCP&L Greater Missouri Operations Company (GMO) submitted proposed tariff sheets to the Missouri Public Service Commission designed to implement a general rate increase for electric service provided to customers in the Missouri service territories of the Company, including St. Joseph. On March 3, 2016, the Commission issued its *Notice of Hearing; Order Setting Conference Date, Directing Notice of Action, and Directing Filings* in this case, establishing March 17, 2016 as the deadline for applications to intervene in this case. Thus, the instant Application to Intervene is timely.
4. Pursuant to 4 CSR 240-2.075, the City of St. Joseph states that as a large consumer of electricity supplied by GMO, and as a governmental body representing the residents and commercial interests of the City, the City of St. Joseph has an interest in this matter which is different from that of the general public and which may be adversely affected by a final order arising from this case. Granting the instant Application to Intervene would also serve the public interest.
5. The City of St. Joseph states that it is still reviewing GMO's filings in this case and does not take a position on GMO's rate request at this time.

WHEREFORE, the City of St. Joseph, Missouri, respectfully requests that the Missouri Public Service Commission grant this Application to Intervene in this matter and make St. Joseph a party to this proceeding for all purposes.

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 opcservice@ded.mo.gov) and on all parties of record on this 8th day of March 2016.

/s/ William D. Steinmeier

William D. Steinmeier