

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

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for)
Approval to Make Certain Changes in its) Case No. ER-2010-0356
Changes For Electric Service)

EMPIRE’S APPLICATION TO INTERVENE

COMES NOW The Empire District Electric Company (“Empire”), by counsel and pursuant to 4 CSR 240-2.075, and for its application to intervene in the above-captioned proceeding, respectfully states as follows to the Missouri Public Service Commission (the “Commission”):

1. Empire is a Kansas corporation with its principal office and place of business at 602 Joplin Street, Joplin, Missouri, 64802. Empire is qualified to conduct business and is conducting business in Kansas as well as in the states of Missouri, Arkansas and Oklahoma. Empire is engaged, generally, in the business of generating, purchasing, transmitting, distributing and selling electric energy in portions of said states. Empire also provides water service and, through its subsidiary, natural gas distribution service in Missouri. Empire's Missouri operations are subject to the jurisdiction of the Commission as provided by law.

2. A certified copy of Empire’s Restated Articles of Incorporation, as amended, was filed in Case No. EF-94-39 and is incorporated herein by reference in accordance with Commission rule 4 CSR 240-2.060(1)(G). A Certificate from the Missouri Secretary of State that Empire, a foreign corporation, is authorized to do business in Missouri was filed with the Commission in Case No. EM-2000-369 and is incorporated by reference in accordance with Commission rule 4 CSR 240-2.060(1)(G). This information is current and correct. Other than appeals of Commission rate case decisions and Empire’s current rate case before the Commission (ER-2010-0130), Empire has no pending actions or final unsatisfied judgments or

decisions against it from any state or federal agency or court that involve customer service or rates. Empire's annual report and assessment fees are not overdue.

3. Communications relating to this application and proceeding should be directed to the undersigned counsel.

4. On June 4, 2010, KCP&L Greater Missouri Operations Company ("GMO") submitted to the Commission proposed tariff sheets intended to implement a general rate increase for electrical service provided in its Missouri service area. The proposed tariff sheets bear a requested effective date of May 4, 2011.

5. By the Commission's Order of June 11, 2010, an intervention deadline of July 1, 2010, was established herein. Therefore, this application is being timely filed.

6. Empire should be allowed to intervene in this proceeding, because Empire has an interest that is different from that of the "general public" which may be adversely affected by a final order in this case and because granting intervention to Empire would serve the public interest.

7. Iatan 1, a coal-fired electric generation unit located at the Iatan site near Weston, Missouri, is jointly owned by Kansas City Power & Light Company ("KCPL"), GMO, and Empire. Iatan 2 is a new generating unit, with a projected capacity of approximately 800-900 MW of electric power, located at the Iatan site near Weston, Missouri, which is jointly owned by KCPL, GMO, Empire, and others. Iatan 2 is not currently in commercial operation.

8. Empire's status as a Missouri public utility and Empire's direct specific interests in the subject of this proceeding, particularly with regard to the prudence of the construction of Iatan 1 and 2, indicate that Empire's interests are unique and that its intervention would serve the public interest.

9. Empire cannot yet state precisely what its positions will be in this proceeding. Upon further review of the filings made herein, Empire will be able to state its position in this matter. A detailed statement of position and identification of issues with respect to this proceeding may be submitted by Empire in accordance with any procedural schedule.

WHEREFORE, for the reasons stated herein, Empire respectfully requests that the Commission issue an order permitting it to intervene in this case with full rights as a party hereto.

Respectfully submitted,

/s/ Diana C. Carter
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ATTORNEYS FOR THE EMPIRE
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission to all counsel of record on this 1st day of July, 2010.

/s/ Diana C. Carter