

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

Application of Kansas City Power & Light)	
Company for Approval of the Transfer of Existing)	
Common Facilities and Permit Interests, and)	Case No. EO-2011-0334
Materials and Supplies Inventory Administration)	
at the Iatan Generating Station.)	

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 the states of Missouri, Kansas, 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. 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, other than the following pending action: Karen J. Brooks, et al. v. The Empire District Electric Company, Jasper County Case No. 11AO-CC00385. Empire's annual report and assessment fees are not overdue.

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

Blake A. Mertens
Vice President – Energy Supply
The Empire District Electric Company
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4. On March 9, 2012, Kansas City Power & Light Company ("KCPL") submitted its Application herein. An intervention deadline has not yet been established herein.

5. KCPL's Application seeks approval of the transfer of existing common facilities located at the Iatan Generating Station to the Kansas Electric Power Cooperative, Inc. ("KEPCo") and the Missouri Joint Municipal Electric Utility Commission ("MJMEUC"), approval of the transfer of interests in permits to certain other owners of the new Iatan Unit 2 electric generating facility, and approval for the sale of an interest in utility materials and supplies inventory to KEPCo and MJMEUC.

6. Iatan Unit 1 is jointly owned by KCPL, KCP&L Greater Missouri Operations Company ("GMO"), and Empire. Iatan Unit 2 is jointly owned by KCPL, GMO, Empire, KEPCo, and MJMEUC. Both units are located at the Iatan Generating Station in Platte County, Missouri.

7. Empire should be allowed to intervene in this proceeding, because Empire has an interest that is different from that of the "general public" and which may be affected by a final

order in this case and because granting intervention to Empire would serve the public interest. Empire's status as a Missouri public utility and as a joint owner of Iatan Unit 1 and Iatan Unit 2 indicate that Empire's interests are unique and that its intervention would serve the public interest.

8. 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
DISTRICT ELECTRIC COMPANY

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 13th day of March, 2012.

/s/ Diana C. Carter