

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of)
Kansas City Power & Light Company for) Case No. ER-2006-0314
Approval to Make Certain Changes in)
its Charges for Electric Service to)
Begin the Implementation of its)
Regulatory Plan.)

APPLICATION OF JACKSON COUNTY, MISSOURI, TO INTERVENE

COMES NOW the County of Jackson, Missouri, pursuant to 4 C.S.R. 240-2.075 of the Rules of Practice and Procedure, and for its Application to Intervene states:

1. The County of Jackson ("County"), is a political subdivision of the State. The County and many of its citizens receive electric service from Kansas City Power & Light Company ("KCPL").

2. Correspondence, communications, Orders and decisions in this Matter should be addressed to:

Honorable Katheryn Shields
County Executive
Jackson County Courthouse
415 E. 12th Street
Kansas City, Missouri 64106

Jeremiah D. Finnegan
1209 Penntower Building
3100 Broadway
Kansas City, Missouri 64111
(816) 753-1122
(816) 756-0373 Facsimile

3. On February 1, 2006 Kansas City Power & Light Company ("KCPL") filed an

application requesting a general rate increase of \$55 million per year.

4. The purpose of the County's intervention is to protect its interests and those of its citizens as users of electric service. Thus, it has an interest not only as a large user, but also on behalf of all its citizens.

5. At this time, Jackson County has not had a full opportunity to study the filing or understand the full ramifications thereof, however, it is concerned with the impact of the increase on the County and its residents and citizens. Therefore, Jackson County's position is to oppose the relief sought at this time and until such time as it is convinced that the increase is just, reasonable and lawful.

6. The granting of the proposed intervention would serve the public interest and the Petitioner is a political subdivision of the State.

WHEREFORE, for the foregoing reasons, Jackson County respectfully requests that the Commission grant its Application to Intervene in this matter.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was mailed, postage prepaid, and/or electronically to the following this 22nd day of February, 2006:

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