

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

In the Matter of the Application of Osage Valley )  
Electric Cooperative for Approval of a Change in )  
Electric Suppliers for Certain Customers within the )  
City of Clinton for Reasons in the Public Interest. )

**File No. EO-2011-0137**

**APPLICATION OF  
KCP&L GREATER MISSOURI OPERATIONS COMPANY  
TO INTERVENE**

COMES NOW KCP&L Greater Missouri Operations Company (hereinafter “GMO”), pursuant to 4 CSR 240-2.075, et seq. and the Commission’s *Order and Notice* issued November 10, 2010 (“Order”) in this proceeding, and applies to intervene and to become a party herein. In support thereof, GMO states:

1. GMO is a Delaware corporation with its principal office and place of business at One Kansas City Place, 1200 Main, Kansas City, Missouri 64106. GMO is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of western Missouri. GMO is an electrical corporation and public utility as defined in Mo. Rev. Stat. § 386.020 (2000). GMO provided its Amended Certificate of Authority of a Foreign Corporation in Case No. EN-2009-0164, which is incorporated herein by reference.

2. GMO has one pending action<sup>1</sup> or final unsatisfied judgments or decisions against it from any state or federal agency or court that involves customer service or

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<sup>1</sup> *Ag Processing, Inc. a Cooperative v. KCP&L Greater Missouri Operations Company*, Mo. P.S.C. File No. HC-2010-0235.

rates, which has occurred within three years of the date of this Application. No annual report or assessment fees are overdue.

3. All correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

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4. On November 9, 2010, Osage Valley Electric Cooperative (“Osage”) submitted to the Commission an Application for Change of Electrical Suppliers. As reflected in the Commission’s Order, “Osage wants to transfer four customers from Osage to Kansas City Power & Light Company (“KCP&L”).” The Commission’s Order, *inter alia*, directs service of a copy of the order upon KCP&L, and provides that any

proper person or entity desiring to intervene in this matter shall file an application no later than November 30, 2010. Whereas this matter involves customers within the service area of KCP&L Greater Missouri Operations Company, GMO is the real party in interest and hereby enters its appearance in this proceeding.

5. GMO has an interest in this proceeding that is different from that of the general public and which may be adversely affected by a final order arising from this case. Moreover, GMO's intervention in this proposed change of electric suppliers will aid the Commission in resolving the issues raised in this proceeding and, consequently, GMO's intervention and participation will promote the public interest. Based upon its current understanding of the proposed transaction, GMO generally supports the relief sought; however, GMO reserves the right to more fully evaluate this matter and to confirm its position herein.

WHEREFORE, KCP&L Greater Missouri Operations Company respectfully requests that the Commission issue an order authorizing it to intervene in the above-captioned matter.

Respectfully submitted,

**/s/ Larry W. Dority**

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**ATTORNEYS FOR  
KCP&L GREATER MISSOURI  
OPERATIONS COMPANY**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, this 30<sup>th</sup> day of November, 2010, to all parties of record.

**/s/ Larry W. Dority**

Larry W. Dority