

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

In the Matter of the Joint Application of)
Great Plains Energy Incorporated, Kansas)
City Power & Light Company, and KCP&L) Case No. EE-2017-0113
Greater Missouri Operations Company for)
a Variance from the Commission's Affiliate)
Transaction Rule, 4 CSR 240-20.015)
.

**OPPOSITION OF JOINT APPLICANTS TO APPLICATION
TO INTERVENE OF IBEW LOCAL UNIONS 412, 1464 AND 1613**

Great Plains Energy Incorporated ("GPE"), Kansas City Power & Light Company ("KCP&L"), and KCP&L Greater Missouri Operations Company ("GMO") (collectively, "Joint Applicants") state the following in opposition to the Application to Intervene of the International Brotherhood of Electrical Workers Local Unions No. 412, 1464 and 1613 ("IBEW"):

1. IBEW's Application to Intervene fails to set forth facts required by Rule 4 CSR 240-2.075 ("Intervention Rule") that would allow the Commission to grant its request.

2. IBEW has failed to state facts demonstrating that it "has an interest which is different from that of the general public and which may be adversely affected by a final order" in this proceeding. Such facts are required by Subsection (3)(A) of the Intervention Rule. IBEW's unverified application presents no facts indicating what specific interest IBEW or its members may have in this particular proceeding which is different from that of the general public.

3. Although the Joint Applicants recognize that the IBEW has collective bargaining agreements with KCP&L, the Application filed by the Joint Applicants in this matter does not concern those agreements or seek any changes to them. Similarly, the Application does not seek to change any of the rates, terms or conditions of service that are provided by KCP&L or GMO to any of its customers. Consequently, there is no basis for the Commission to conclude that IBEW's interest is any different from that of the general public.

4. Secondly, IBEW has failed to demonstrate under Subsection (3)(A) of the Intervention Rule that it has any interest “which may be adversely affected by a final order arising from the case.” The Stipulation and Agreement (“Stipulation”) agreed to by the Joint Applicants and the Staff of the Commission (“Staff”) proposes to resolve issues raised by the Joint Application which seeks a limited variance from the Commission’s Affiliate Transactions Rule. Given that nothing proposed in the request of the Joint Applicants or in the Stipulation agreed to by the Joint Applicants and Staff would cause a change to IBEW’s collective bargaining agreements, or to any rate, tariff or charge of KCP&L or GMO, IBEW’s interests will not be adversely affected by a final order in this matter.

5. Finally, Subsection (3)(B) of the Intervention Rule states that intervention may also be granted by the Commission if it “would serve the public interest.” IBEW presents no facts showing why its intervention would serve the public interest. Because Staff and the Office of the Public Counsel will be full participants in this proceeding, there is no reason for the Commission to grant IBEW intervention in this proceeding.

6. To the extent that the IBEW has collective bargaining agreements with KCP&L that would be affected by changes in rates or tariffs, those issues will be decided in future general rate cases filed by KCP&L and GMO in which the IBEW would have an opportunity to intervene.

WHEREFORE, the Joint Applicants request that the Commission deny the Application to Intervene of the International Brotherhood of Electrical Workers Local Unions No. 412, 1464 and 1613 as it has failed to make the proper showing under 4 CSR 240-2.075(3).

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CERTIFICATE OF SERVICE (PARTIES)

A copy of the foregoing was served upon the below named parties by email or U.S. mail, postage prepaid, this 28th day of October, 2016.

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**CERTIFICATE OF SERVICE
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A copy of the foregoing was served upon the below named parties by email or U.S. mail, postage prepaid, this 28th day of October, 2016.

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