

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

In the Matter of the Application of Union Electric    )  
Company, d/b/a Ameren Missouri, for a Certificate    )  
Of Convenience and Necessary Authorizing it to    )  
Construct, Install, Own, Operate, Control, Manage    )      Case No. EA-2013-0316  
And Maintain a Sub-Transmission Line to Provide    )  
Electric Service in Clay County, Missouri            )

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

Pursuant to 4 CSR 240-2.075 and the order issued by the Missouri Public Service Commission (“Commission”) on November 30, 2012 in the above-captioned proceeding, KCP&L Greater Missouri Operations Company (“GMO” or the “Company”) hereby applies to intervene and to become a party to the above-captioned case. In support thereof, the Company states as follows:

1.      GMO is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. GMO is primarily engaged in the business of providing electric and steam utility service in Missouri to the public in its certificated areas. GMO is an electrical corporation and public utility as defined in Section 386.020 (2000), as amended. *Id.* A Certificate of Authority for a foreign corporation to do business in the State of Missouri, evidencing the Company’s authority under the law to conduct business in the State of Missouri, was filed with the Commission in Case No. EU-2002-1053 and is incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G). GMO’s fictitious name registration was filed in Case No. EN-2009-0015 and is incorporated herein by reference.

2.      GMO holds Certificates of Convenience and Necessity from the Commission to transact business as an electric public utility in certain areas of the State of Missouri and is

principally engaged in the generation, transmission, distribution and sale of electric power and energy. GMO has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court that involve customer service or rates, which has occurred within three years of the date of this Application other than the following pending action: *Ag Processing, Inc. a Cooperative v. KCP&L Greater Missouri Operations Company*, Case No. HC-2012-0259. In addition, no annual report or assessment fees are overdue.

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

Tim Rush  
Director- Regulatory Affairs  
Kansas City Power & Light Company  
1200 Main Street, 19<sup>th</sup> Floor  
Kansas City, Missouri 64105  
Phone: (816) 556-2344  
Fax: (816) 556-2110  
E-mail: Tim.Rush@kcpl.com

4. It is GMO's understanding that a portion of the proposed line certificate being requested by Ameren Missouri in this proceeding traverses GMO's existing service area. As an electric utility, GMO's interests differ from those of the general public. Although the Company does not currently know what position it will take in this case, its interests will be directly affected and could be adversely affected by a final order issued in this case. The Company should therefore be allowed to fully participate in this case so that it can protect its interests. In addition, allowing the Company to participate as an intervenor serves the public interest because it will afford the Company an opportunity to provide useful and relevant information that may aid the Commission in its deliberations.

**WHEREFORE**, GMO respectfully requests that the Commission issue an order authorizing it to intervene in the above-captioned matter.

Respectfully submitted,

/s/ James M. Fischer

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Attorneys for  
KC&PL 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, to all counsel of record in this case this 14<sup>th</sup> day of December, 2012.

/s/ James M. Fischer

Roger W. Steiner