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

In the Matter of the Application of Union ) Electric Company d/b/a Ameren Missouri ) For Approval of Efficient Electric Program )

File No. ET-2018-0132

## APPLICATION OF KANSAS CITY POWER & LIGHT COMPANY AND KCP&L GREATER MISSOURI OPERATIONS COMPANY FOR LEAVE TO INTERVENE

Pursuant to 4 CSR 240-2.075(10), Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO" collectively, the "Company") seek to intervene in the above-captioned docket. In support of this Application, the Company states:

1. KCP&L is a Missouri corporation with its principal office and place of business at 1200 Main, Kansas City, Missouri 64105. KCP&L is primarily engaged in the generation, transmission, distribution, and sale of electricity in western Missouri and eastern Kansas, operating primarily in the Kansas City metropolitan area. KCP&L is an "electrical corporation" and "public utility" as those terms are defined in Mo. Rev. Stat. §386.020 (2000) and, as such, is subject to the jurisdiction of the Commission as provided by law. KCP&L provided its Certificate of Good Standing in Case No. EF-2017-0242, which is incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G).

2. 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 GMO'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.

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

Tim M. Rush Director, Regulatory Affairs Kansas City Power & Light Company 1200 Main Street, 19<sup>th</sup> Floor Kansas City, Missouri 64105 Phone: (816) 556-2334 Fax: (816) 556-2110 E-mail: Tim.Rush@kcpl.com

Lois J. Liechti Director, Regulatory Affairs Kansas City Power & Light Company 1200 Main Street, 19<sup>th</sup> Floor Kansas City, Missouri 64105 Phone: (816) 556-2612 Fax: (816) 556-2110 E-mail: Lois.Liechti@kcpl.com

Anthony R. Westenkirchner Senior Paralegal, Regulatory Affairs Kansas City Power & Light Company 1200 Main Street Kansas City, Missouri 64105 Phone: (816) 556-2668 Fax: (816) 556-2110 E-mail: anthony.westenkirchner@kcpl.com

4. The Company seeks party status so that it can participate in Ameren Missouri's application for approval of its Efficient Electrification Program ("Application"). The Company generally supports Ameren Missouri's application.

5. Like Ameren, both KCP&L and GMO have an interest in expanding the beneficial and efficient use of electricity in a manner that is cost effective for all. Both KCP&L

2

and GMO also have an extensive electric vehicle charging network and, therefore, the Company's interest in this proceeding is different from that of the general public. The Company's electric vehicle charging network may be affected by an order in this case. In addition, allowing the Company to participate will assist in creating the record for a Commission decision in this case.

WHEREFORE, the Company respectfully request that the Commission issue an order authorizing it to intervene in the above-captioned matter.

Respectfully submitted,

## <u>|s| Roger W. Steiner</u>

Robert J. Hack, MBN 36496 Phone: (816) 556-2791 E-mail: rob.hack@kcpl.com Roger W. Steiner, MBN 39586 Phone: (816) 556-2314 E-mail: roger.steiner@kcpl.com Kansas City Power & Light Company 1200 Main – 19<sup>th</sup> Floor Kansas City, Missouri 64105 Fax: (816) 556-2110

Counsel for Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company

## **CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first class United States Mail, postage pre-paid, to counsel for all parties of record this 14<sup>th</sup> day of March, 2018.

|s| Roger W. Steiner

Roger W. Steiner