

**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)	Case No. EE-2017-0113
Company and KCP&L Greater Missouri Operations)	
Company for a variance from 4 CSR 240-20.015)	

APPLICATION TO INTERVENE OUT OF TIME
BY THE MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION

COMES NOW the Missouri Joint Municipal Electric Utility Commission (MUMEUC), by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this matter. In support of this application, MPGA states as follows:

1. The MJMEUC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 et seq. RSMo., with authority to exercise public powers of a political subdivision of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MJMEUC. Sixty-eight Missouri municipalities are current parties to the joint contract establishing the MJMEUC.

2. Correspondence, communications, orders and the decision in this matter should be addressed to:

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3. MJMEUC serves five municipalities that currently have wholesale power contracts with Kansas City Power & Light Greater Missouri Operations (KCP&L-GMO) and

seven municipalities directly imbedded in KCP&L-GMO's transmission system that take transmission through the Southwest Power Pool (SPP).

4. MJMEUC is one of five owners, along with Kansas City Power and Light Company (KCP&L) and KCP&L-GMO, of the Iatan 2 Generating Plant ("Iatan 2") located at the Iatan Generating Station in Platte County, Missouri. Iatan 2 is an 850 MW super-critical, coal-fired power plant with state-of-the-art environmental controls. Iatan 2 became operational on December 31, 2010. The owners and ownership shares of Iatan 2 are as follows:

- a. KCP&L: 54.71%
- b. KCP&L-GMO: 18.00%
- c. Empire District Electric Company (Empire): 17.00%
- d. MJMEUC: 11.76%
- e. Kansas Electric Power Cooperative (KEPCo): 3.53%

5. MJMEUC has an interest that is different from that of the general public, in that it represents the interest of municipal electrical systems throughout the state, as well as municipal electric systems directly imbedded in KCP&L-GMO's transmission system that take transmission through SPP and municipal electrical systems that have wholesale power contracts with KCP&L-GMO. MJMEUC also has interests in the Iatan-2 generating plan co-owned with KCP&L and KCP&L-GMO. MJMEUC and its members have direct and immediate interests in this proceeding that are not currently represented in this matter.

6. MJMEUC believes that its intervention and participation in this proceeding would serve the public interest by clarifying the issues under consideration, ensuring completeness of the record, and assisting the Commission in its decision-making in this case, and wishes to become a party to this case for all purposes.

7. MJMEUC is seeking permission to intervene in this matter pursuant to 4 CSR 240.2.075. Pursuant to 4 CSR 240-2.075(10), the Commission is authorized to grant the instant Application after the October 26, 2016, intervention date.

8. MJMEUC hereby affirmatively accepts the record established in this case, including the requirements of any orders of the Commission, as of the date the instant Application is filed.

9. No party to this matter will be adversely impacted or prejudiced by granting this Application to intervene. The case was not initially designated as a contested case and MJMEUC has acted as judiciously as possible to submit the instant Application to Intervene upon learning of the instant filing with the Commission.

WHEREFORE, MJMEUC respectfully requests that the Commission grant its Application to Intervene on its behalf and on behalf of its members, entitling it to fully participate in this proceeding.

Respectfully submitted,

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Dated: December 7, 2016

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 7th day of December, 2016.

A handwritten signature in black ink that reads "Terry M. Jarrett". The signature is written in a cursive style with a horizontal line extending from the top of the "T".

Terry M. Jarrett