

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

In the Matter of the Application of Kansas City)	
Power & Light Company for Approval to Make)	<u>Case No. ER-2006-0314</u>
Certain Changes in its Charges for Electric)	Tariff No. YE-2006-0594
Service to Begin the Implementation of Its)	
Regulatory Plan)	

**MOTION FOR LEAVE TO FILE
APPLICATION TO INTERVENE OUT OF TIME**

COME NOW International Brotherhood of Electrical Workers, Local Unions No. 412, 1464, and 1613, (“Locals 412, 1464, and 1613” or the “Locals”) by and through their counsel, Blake & Uhlig, P.A., and respectfully move the Missouri Public Service Commission for Leave to file the attached Application to Intervene With Suggestions Out of Time. In support of this Application, the Petitioners state as follows:

1. Locals 412, 1464 and 1613 are voluntary organizations doing business and representing employees in the State of Missouri. The Locals are also labor organizations as defined in the National Labor Relations Act, as amended, 29 U.S.C. § 152, *et seq.* The Locals have separate collective bargaining agreements with Kansas City Power & Light Company and represent certain employees of KCP&L.

2. The names, addresses and telephone numbers of the Petitioners seeking leave to intervene are:

Ted Stewart, Business Manager
IBEW Local Union No. 412
6200 Connecticut, Suite 105
Kansas City, Missouri 64120
(816) 231-4530

Darrell McCubbins, Business Manager
IBEW Local Union No. 1464
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Mike Long, Business Manager
IBEW Local Union No. 1613
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Counsel: Jane L. Williams
James R. Waers
Blake & Uhlig, P.A.
753 State Avenue
Suite 475
Kansas City, Kansas 66101
(913) 321-8884

3. On February ___, 2006, Kansas City Power & Light Company filed its Application for Approval to Make Certain Changes in Its Charges For Electric Services to Begin the Implementation of Its Regulatory Plan.

4. The Missouri Public Service Commission set February 23, 2006, as the deadline for filing Applications to Intervene. However, Petitioners were unaware of the filing of this Application and of the deadline for filing Applications to Intervene until after the deadline had passed.

5. This Motion for Leave to File Application to Intervene Out of Time is not sought to delay this action, nor will any party to this action be prejudiced or inconvenienced by the relief sought.

WHEREFORE, Petitioners respectfully request the Missouri Public Service Commission's Order granting their Motion for Leave to File Application to Intervene Out of Time.

Dated this 3rd day of March, 2006.

Respectfully submitted,

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By: /s/ Jane L. Williams
Jane L. Williams, Mo. Bar No. 53291
James R. Waers, Mo. Bar No. 26220

ATTORNEYS FOR IBEW LOCALS 412,
1464, AND 1613

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing ***Motion For Leave To File Application To Intervene Out Of Time*** was served upon all parties to this action, either by U.S. Mail, Hand-delivered, transmitted by Facsimile or electronically mailed, this 3rd day of March, 2006, addressed as follows:

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/s/ Jane L. Williams
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