

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

|                                                  |                       |
|--------------------------------------------------|-----------------------|
| In the Matter of the Consideration of Adoption ) |                       |
| Of the PURPA Section 111(d)(13) Fossil Fuel )    | Case No. EO-2006-0495 |
| Generation Efficiency Standard as Required by )  |                       |
| Section 1251 of the Energy Policy Act of 2005 )  |                       |

**APPLICATION OF KANSAS CITY POWER & LIGHT COMPANY  
FOR LEAVE TO INTERVENE**

Pursuant to 4 CSR 240-2.075 and the order issued by the Missouri Public Service Commission ("Commission") on June 23, 2006 in the above-captioned proceeding, Kansas City Power & Light Company ("KCPL") hereby applies to intervene and to become a party to the above-captioned case. In support thereof, KCPL states as follows:

1. KCPL is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 1201 Walnut, Kansas City, Missouri 64106. KCPL is engaged in the generation, transmission, distribution, and sale of electric energy and power in those areas in Missouri certificated to it by the Missouri Public Service Commission ("Commission"), including the City of Kansas City, Missouri, as well as in areas of eastern Kansas.

2. KCPL 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. KCPL provides electric service to approximately 230,000 residential customers and approximately 30,100 commercial and industrial customers in Missouri. KCPL's Certificate of Good Standing was filed with the Commission in Case No. EM-2000-464 and is incorporated herein by reference.

3. KCPL has pending or final judgments or decisions against it from state or federal regulatory agencies or courts which involve customer service occurring within the three (3) years immediately preceding the filing of this application, except as listed in Exhibit A. KCPL has a

general rate case pending before the Commission in Case No. ER-2006-0314. KCPL has no overdue Commission annual reports or assessment fees.

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

Tim Rush  
Director- Regulatory Affairs  
Kansas City Power & Light Company  
1201 Walnut – 13<sup>th</sup> Floor  
Kansas City, Missouri 64106  
Phone: (816) 556-2344  
Fax: (816) 556-2110  
E-mail: Tim.Rush@kcpl.com

Curtis Blanc  
Kansas City Power & Light Company  
1201 Walnut – 20<sup>th</sup> Floor  
Kansas City, Missouri 64141  
Phone: (816) 556-2483  
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5. On June 23, 2006, the Commission issued an “Order Directing Notice, Establishing Time for Filing Recommendations, Setting Date for Submission or Intervention Requests and Setting Date for Filing a Procedural Schedule.” In this proceeding, the Commission will consider whether to adopt each of the new Section 111(d) standards. The Commission directed any interested party to intervene in this case by July 24, 2006.

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

Respectfully submitted,

/s/ **Curtis D. Blanc**

Curtis D. Blanc (Mo. Bar. No. 58052)  
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**Counsel for Kansas City Power & Light Company**

Dated: July 24, 2006

## 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, this 24th day of July, 2006, to:

Steve Dottheim  
Chief Deputy General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

Dennis L. Frey  
Senior Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

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L. Russell Mitten  
Brydon, Swearngen & England, P.C.  
312 E. Capitol Avenue  
P.O. Box 456  
Jefferson City, MO 65102

/s/ *Curtis D. Blanc*

Curtis D. Blanc

**Exhibit A:**

The following is a listing of Applicant's pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this application:

1.     *Tony Walker v. Kansas City Power & Light Co.*, MPSC Case No. EC-2006-0451.
2.     *Anthony Broughton v. Kansas City Power & Light Co.*, MPSC Case No. EC-2007-0018.