

**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	)	<b><u>Case No. ER-2006-0314</u></b>
Certain Changes in its Charges for Electric	)	Tariff No. YE-2006-0594
Service to Begin the Implementation of Its	)	
Regulatory Plan	)	

**APPLICATION TO INTERVENE WITH SUGGESTIONS**

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 submit this Application to Intervene With Suggestions pursuant to Rule 82-1-225, Rules of Practice and Procedure. 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  
6200 Connecticut, Suite 105  
Kansas City, Missouri 64120  
(816) 231-1464

Mike Long, Business Manager  
IBEW Local Union No. 1613  
6200 Connecticut, Suite 105  
Kansas City, Missouri 64120  
(816) 241-1613

Counsel: Jane L. Williams  
James R. Waers  
Blake & Uhlig, P.A.  
753 State Avenue  
Suite 475  
Kansas City, Kansas 66101  
(913) 321-8884

3. The Petitioners request that service be made to the Petitioners and their counsel.

4. The Petitioners represent employees who may be affected by Orders entered by the Commission in this proceeding, and, accordingly, the Petitioners and the employees they represent are interested parties in this proceeding. The Petitioners herein and the employees they represent have a direct interest in this proceeding which is different from that of the general public, and which interests cannot be adequately represented by any other party.

5. The Petitioners have no current position regarding the Application herein. However, to the extent that said Application may impact on the wages, benefits, and terms and conditions of employment of the employees that the Petitioners represent, Petitioners reserve the right to participate in the proceedings to the extent necessary to protect the interests of their members.

6. No party will be adversely affected if this Petition is granted.

WHEREFORE, having stated the grounds for intervention, their position and interest in this proceeding, the International Brotherhood of Electrical Workers, Local Unions No. 412, 1464; and 1613 hereby request that the Commission:

- A. Grant them leave to intervene in this proceeding on their behalf and on behalf of their members and to be heard at such time as the Commission may fix; and
- B. In all respects be a party to this proceeding.

Dated this 3rd day of March, 2006.

Respectfully submitted,

BLAKE & UHLIG, P.A.  
753 State Avenue  
Suite 475  
Kansas City, Kansas 66101  
(913) 321-8884

2500 Holmes  
Kansas City, Missouri 64108  
(816) 472-8883

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 *Application to Intervene With Suggestions* was served upon all parties to this action, either by U.S. Mail, Hand-delivered, transmitted by Facsimile or electronically mailed, this 3<sup>rd</sup> day of March, 2006, addressed as follows:

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/s/ Jane L. Williams

Attorney for IBEW 412, 1464, and 1613