

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) Case No. ER-2007-0291
Certain Changes in its Charges for Electric)
Service to Implement of its Regulatory Plan)

APPLICATION TO INTERVENE OF UNITED STATES DEPARTMENT OF ENERGY, NATIONAL NUCLEAR SECURITY ADMINISTRATION AND FEDERAL EXECUTIVE AGENCIES

COMES NOW, The United States National Nuclear Security Administration
("NNSA") on behalf of itself, the United States Department of Energy ("DOE") and
all other affected Federal Executive Agencies ("FEA") (collectively "DOE/NNSA")
pursuant to 4 C.S.R. 240-2.075 and applies to intervene herein on behalf of
DOE, NNSA and FEA and to become a party hereto for all purposes and in
support respectfully states:

1. NNSA is a separately organized agency of DOE created by the National Nuclear Security Administration Act, National Defense Authorization Act for Fiscal Year 2000, Pub. L. 106-65, div. C, title XXXII, Sec. 3211 et seq., Oct. 5, 1999, 113 Stat. 957, codified in Title 50 USC Section 2401 et seq. and various other titles.
2. DOE/NNSA owns and operates the NNSA Kansas City Site Office and facility located in Kansas City, Missouri.
3. DOE/NNSA is a large industrial electric customer of KCPL consuming approximately 156,000 MWhs of electric power annually at an annual cost approximating \$5.9 million. As such it will be materially and substantially affected by KCPL's request for a \$45.4 million dollar increase in its

Missouri jurisdictional rates filed with the Commission on February 1, 2007.

4. FEA represents all federal executive agencies located in KCPL's service territory which purchase electricity from KCPL. FEA will be materially and substantially affected by KCPL's request for a \$45.4 million dollar increase in its Missouri jurisdictional rates filed with the Commission on February 1, 2007.
5. DOE/NNSA is authorized by a grant of Delegation of Authority from the General Services Administration pursuant to Section 201 (a)(4) of the Federal Property and Administrative Services Act of 1948, as amended (49 U. S. C. 481 (a) (4)) to represent the customer interests of affected executive agencies of the federal government in this proceeding.
6. DOE/NNSA has intervened as an active party in many KCPL cases before this Commission in the past and recently was an intervenor in Case No. EO-2005-0329 KCPL's Experimental Regulatory Plan and Case No. ER-2006-0314 KCPL's first rate case filed in accordance with KCPL's Experimental Regulatory Plan.
7. The undersigned is an attorney for NNSA and is not admitted to practice before the courts of the State of Missouri but is admitted to practice before the courts in the states of New Mexico, Texas, Massachusetts and Mississippi and also Washington D.C. The undersigned has been in the active practice of law since 1999.

8. The undersigned certifies that no attorney for NNSA nor DOE is under suspension or disbarment by any of the courts of New Mexico, Texas, Massachusetts, Washington, D.C. or Mississippi.
9. DOE/NNSA designates Mark W. Comley, Esq. of the firm of Newman, Comley & Ruth, PC, 601 Monroe Street, Suite 301, Jefferson City, MO 65102 a member of the Missouri Bar with an office within the State of Missouri as associate counsel.
10. Mark W. Comley, contemporaneously with the filing of this application is entering his appearance as DOE/NNSA associate counsel in this case.
11. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

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12. On February 1, 2007 KCPL filed with this Commission an Application and tariffs to increase its rates for electric service in its Missouri area. The issues raised, directly affect present electric rates, and will have a substantial effect on the level of electric rates incurred by DOE/NNSA and FEA.
13. The cost of electricity is a significant portion of the operating costs of the DOE/NNSA Kansas City facility and other federal executive agencies. DOE/NNSA and FEA are therefore directly interested in the Application and tariffs filed by KCPL and will be materially affected by any Commission action taken in this proceeding.
14. Any increase in electric rates at the DOE/NNSA Kansas City facility and other affected federal executive agencies will affect United States taxpayers and may impair the ability of the agencies to carry out their missions. Therefore, DOE-NNSA has a direct and immediate interest in the outcome of this proceeding that cannot be adequately addressed by any other party.

15. In compliance with 4 C.S.R. 240-2.075(5) Applicant states that it is filing this Application after the intervention due date of February 26, 2007 for the reasons that permission to intervene was required to be obtained from headquarters DOE and due to Applicants attorney not being a member of the Missouri Bar, and Applicant being required to obtain local counsel to appear in this case.

WHEREFORE, DOE/NNSA prays the Commission to grant its request to intervene and that it be accorded full party status in this docket.

Respectfully submitted this 2nd day March 2007.

/S/ Paul N. Jones

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by electronic means or by U.S. mail, postage prepaid, addressed to the legal representatives of all parties that have been identified as parties and petitioning intervenors through the Commission's Electronic Filing and Information System as of this date and the Office of Public Counsel.

/S/ Paul N. Jones

Paul N. Jones
Attorney for DOE/NNSA and FEA

Dated: March 2, 2007