

**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)

**SUPPLEMENTAL 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. KCPL supplements its initial application for leave to intervene in compliance with the Commission's July 25, 2006 order in this proceeding.

5. 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 – 13th 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 – 20th Floor
Kansas City, Missouri 64141
Phone: (816) 556-2483
Fax: (816) 556-2787
Email: Curtis.Blanc@kcpl.com

6. 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.

7. As an electric utility, KCPL's interests differ from those of the general public. Although the company does not currently know what position it will take in this case, KCPL's interests will be directly affected and could be adversely affected by any changes to the Commission's regulations implementing PURPA Section 111(d). KCPL should therefore be allowed to fully participate in this case so that it can protect its interests. In addition, allowing KCPL to participate as an intervenor serves the public interest because it will afford the company an opportunity to provide useful and relevant information that may aid the Commission in its deliberations.

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)
Kansas City Power & Light Company
1201 Walnut
Kansas City, Missouri 64141
Telephone: (816) 556-2483
Fax: (816) 556-2787
Email: Curtis.Blanc@kcpl.com

Counsel for Kansas City Power & Light Company

Dated: July 25, 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 25th 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

Office of the Public Counsel
Governor Office Building
200 Madison Street, Suite 650
Post Office Box 2230
Jefferson City, Missouri 65102

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

James B. Lowery
111 South Ninth Street, Suite 200
P.O. Box 918
Columbia, MO 65202-0917

Thomas M. Byrne
AmerenUE
1901 Chouteau Avenue
P.O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149

Henry B. Robertson
705 Olive Street, Suite 614
St. Louis, MO 63101

Kathleen G. Henry
705 Olive Street, Suite 614
St. Louis, MO 63101

Shelley Woods
Missouri Dept. of Natural Resources
P.O. Box 899
Jefferson City, MO 65102-0899

/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.