

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

In the Matter of the Joint Application of Great Plains)
Energy Incorporated, Kansas City Power & Light) Case No. EE-2017-0113
Company and KCP&L Greater Missouri Operations)
Company for a variance from 4 CSR 240-20.015.)

APPLICATION TO INTERVENE BY THE CITY OF INDEPENDENCE, MISSOURI

The City of Independence, Missouri (“the City”), by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this matter. In support of this application, the City states as follows:

1. The City owns and operates a municipal electric utility which was established in 1901 to provide the residents and businesses of Independence, Missouri with safe, reliable and affordable electric service.

2. The City serves more than 55,000 customers. The City maintains and operates 9 generating units, 13 major substations, and more than 650 miles of electric distribution and transmission lines. Some of the electric energy required to meet customer demand is generated by the City, but the City acquires much of the power and energy needed to meet its customers' demand from resources and suppliers that are outside of the City.

3. The City has direct physical interconnections with Kansas City Power & Light (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”). The City also has a long-term Power Purchase Agreement (PPA) with The Missouri Joint Municipal Electric Utility Commission (“MJMEUC”), of which the City is a member. This PPA provides IPL with capacity and energy totaling 5.88% of KCPL’s 881 MW (Nominal) Iatan-2 Generating unit. This PPA provides 14% of IPL’s Accredited Capacity (52 MW) and 32% of IPL’s annual customer load

(MWs). This PPA represents 50% of MJMEUC's ownership share of KCP&L's Iatan-2 generating unit. In addition IPL is a joint owner in the Dogwood Combined Cycle Generating Facility located in GMO's transmission system. This ownership share of Dogwood provides 75 MW of Accredited Capacity (20% of IPL's total Accredited Capacity) and is a significant source of IPL energy. As such IPL is subject to the availability of GMO's transmission system. IPL also has long-term PPA's for capacity and energy from OPPD's Nebraska City-2 generating unit (Southeast Nebraska), the Smoky Hills II Wind farm (Central Kansas), and the Marshall Wind Farm (Northeast Kansas). All of these PPA's rely on transmission through GMO, KCP&L and/or Westar transmission facilities. The City is also a retail customer of KCP&L. KCP&L provides retail electric service to the City's Courtney Bend Water Treatment Plant, which is located outside of the City's corporate limits. KCP&L also provides electric service to a large retail customer located within the City (the Lake City Army Ammunitions Plant).

4. The City has direct and immediate interests in this proceeding that cannot be adequately represented by any other party. As is evident from the foregoing summary of arrangements, the City has power purchase agreements with the joint applicants, is a retail customer of KCP&L in connection with the City's water treatment plant, has physical interconnections with the joint applicants, has interests in KCP&L's Iatan-2 generating unit, and is dependent on the transmission systems of the joint applicants for transmission service from the described sources and to access other third party wholesale suppliers and other generating resources. The City's primary electrical access to the outside world is by way of its interconnections with the joint applicants.

5. Correspondence and communications, including service of all notices and orders of this Commission, and pleadings in this proceeding, should be addressed to:

Dayla Bishop Schwartz, MO #31399
City Counselor
City of Independence
111 East Maple Street
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Tel: 816-325-7217
Fax: 816-325-7219
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WHEREFORE, the City respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Dated: October 26, 2016

Respectfully submitted,


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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list on this 26th day of October, 2016.

A handwritten signature in blue ink, reading "Dayla Bishop Schwartz", is written over a horizontal line.

Dayla Bishop Schwartz