BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of a General Investigation to)	
Examine the Effect of Kansas Senate Bill No. 91)	Docket No. 16-GIME-258-GIE
Regarding Renewable Energy Standards)	

<u>PETITION TO INTERVENE OF</u> KANSAS CITY POWER & LIGHT COMPANY

COMES NOW Kansas City Power & Light Company ("KCP&L") and moves the State Corporation Commission of the State of Kansas ("Commission") for an order permitting it to intervene in the above-captioned matter pursuant to K.S.A. 77-521 and K.A.R. 82-1-225. In support thereof, KCP&L states as follows:

- 1. On December 11, 2015, the Commission Staff ("Staff") filed a Motion to Open Docket and attached its Report and Recommendation ("R&R") requesting a general investigation to examine the effect of Kansas Senate Bill No. 91 ("SB 91") regarding renewable energy standards ("RES").
- 2. On January 5, 2016, the Commission issued an Order Opening Docket to evaluate the impact of SB 91 upon the Commission's rules and regulations and directing the Staff to file a subsequent R&R that advises on impacts and a recommended course of action.
- 3. KCP&L is a vertically integrated electric public utility company under the jurisdiction of the Commission that is engaged in the generation, transmission, distribution and sale of electric energy to the public within the meaning of K.S.A. 66-104, in legally designated areas of Kansas. KCP&L holds a Certificate of Convenience and Authority issued by this Commission, authorizing KCP&L to engage in such utility business. KCP&L has previously filed with the Commission certified copies of its Articles of Incorporation under which it was

organized, and its Certificate of Registration as a Foreign Corporation authorized to do business in Kansas, and all amendments thereto and restatements thereof, and the same are incorporated herein by reference.

- 4. As a vertically integrated electric public utility in the State of Kansas required to comply with the Commission's rules and regulations, KCP&L has a substantial interest in the outcome of this proceeding. Furthermore, KCP&L possesses expertise, insight, experience and information that may assist the Commission in its investigation. Pursuant to ¶6 of the Commission's January 5, 2016 Order, KCP&L hereby petitions the Commission to participate in this docket and to be placed on the official service list.
- 5. In addition to signatory counsel, communications and correspondence in regard to this Application should be addressed to:

Mary Turner
Director, Regulatory Affairs
Kansas City Power & Light Company
One Kansas City Place
1200 Main Street, 19th floor
Kansas City, MO 64105
(816) 556-2874
(816) 556-2110 Fax
mary.turner@kcpl.com

Nicole Wehry
Senior Paralegal
Kansas City Power & Light Company
One Kansas City Place
1200 Main Street, 16th floor
Kansas City, MO 64105
(816) 556-2077
(816) 556-2787 Fax
nicole.wehry@kcpl.com

WHEREFORE, KCP&L respectfully requests that the Commission issue an order allowing it to intervene and participate in this docket, and for such further and other relief as may be appropriate.

Respectfully submitted,

|s| Robert J. Hack

Robert J. Hack (KS #12826) Telephone: (816) 556-2791 Roger W. Steiner (KS #26159) Telephone: (816) 556-2314

Kansas City Power & Light Company

One Kansas City Place 1200 Main Street – 16th Floor Kansas City, Missouri 64105 Facsimile: (816) 556-2787 E-mail: rob.hack@kcpl.com E-mail: roger.steiner@kcpl.com

Glenda Cafer (KS #13342)
Telephone: (785) 271-9991
Terri Pemberton (KS #23297)
Telephone: (785) 232-2123
CAFER PEMBERTON, L.L.C.
3321 SW 6th Avenue
Topeka, Kansas 66606
Facsimile: (785) 233-3040
glenda@caferlaw.com
terri@caferlaw.com

COUNSEL FOR KANSAS CITY POWER & LIGHT COMPANY

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on this 26th day of January, 2016, a true and correct copy of the above and foregoing Petition to Intervene of Kansas City Power & Light Company was electronically served, hand-delivered or mailed, postage prepaid, to the belownamed individuals:

JAMES G. FLAHERTY, ATTORNEY ANDERSON & BYRD, L.L.P. 216 S HICKORY PO BOX 17 OTTAWA, KS 66067 iflaherty@andersonbyrd.com

ANGELA CLOVEN
EMPIRE DISTRICT ELECTRIC COMPANY
PO BOX 127
602 S JOPLIN AVENUE
JOPLIN, MO 64802-0127
acloven@empiredistrict.com

W. SCOTT KEITH, DIRECTOR OF PLANNING AND REGULATORY EMPIRE DISTRICT ELECTRIC COMPANY 602 S JOPLIN AVE (64801) PO BOX 127 JOPLIN, MO 64802 skeith@empiredistrict.com

BRYAN OWENS, ASSISTANT DIRECTOR OF PLANNING & REGULATORY EMPIRE DISTRICT INDUSTRIES, INC. 602 JOPLIN PO BOX 127 JOPLIN, MO 64802-0127 bowens@empiredistrict.com

AMBER SMITH, CHIEF LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 a.smith@kcc.ks.gov

|s| Robert J. Hack

Robert J. Hack