

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of a General Investigation of)
Kansas City Power & Light Company's) Docket No. 16-GIME-576-GIE
All-Electric Residential Rates)

PETITION TO INTERVENE

Kansas Gas Service, A Division of ONE Gas, Inc. ("Kansas Gas Service" or "Company"), hereby petitions the State Corporation Commission of the State of Kansas ("Commission") for an Order allowing it to intervene herein pursuant to K.S.A. 77-521 and K.A.R. 82-1-225. In support of its Petition Kansas Gas Service states as follows:

1. Kansas Gas Service is a natural gas public utility operating in the state of Kansas pursuant to certificates of convenience and necessity issued by the Commission. Its principal place of business is: 7421 West 129th Street, Overland Park, Kansas 66213.

2. On December 31, 2015, Kansas City Power and Light Company ("KCP&L") filed an application for approval of an All-Electric Rider Tariff. The matter was docketed as 16-KCPE-325-TAR ("325 Docket").

3. On June 21, 2016, the Commission issued an Order staying the 325 Docket and an Order Opening General Investigation resulting in the opening of this docket for the purpose of determining the appropriateness of granting all-electric heating customers a discounted or preferential rate. In this Order, the Commission announced its intent to engage an independent third-party consultant to conduct an evaluation of KCP&L's all electric rate structure.

4. On September 22, 2016, the Commission issued a Procedural Order wherein it announced its decision to delay the efforts to engage a third-party consultant and instead directed interested parties to file with the Commission written reports which analyze alternative methodologies

for determining what benefit residential all-electric space heating customers provide to the KCP&L system and KCP&L's residential non-all electric space heating customers. The Order also directed Parties to this docket to include in their reports the response to one additional question and its four sub-parts relating to the costs and benefits of providing discounted rates to residential all-electric space heating customers.

5. While Kansas Gas Service has no objections to KCP&L's Application as filed in the 325 Docket, Kansas Gas Service seeks leave to intervene in the current docket for the purposes of monitoring the proceedings and for the ability to participate as may be necessary to protect the Company's interests. Specifically, Kansas Gas Service would plan to provide the Commission information from the perspective of a natural gas provider as to the impact any policies developed as a result of this docket may have on its gas customers. Kansas Gas Service would also plan to demonstrate that impacts associated with discounted all-electric rates go beyond affecting electric customers and represent an important public policy consideration which is broad in scope.

6. Kansas Gas Service's interests herein are not adequately represented by the existing parties.

7. Granting intervention and party status to Kansas Gas Service will not impede the progress of this docket. Kansas Gas Service accepts the schedule being proposed by the parties in this docket, including the parties' request that their initial report addressing the policy issues raised by the Commission be filed by July 1, 2017.

8. All communications and correspondence to Kansas Gas Service, including service of all notices and orders of the Commission herein are requested to be sent to the following named individuals:

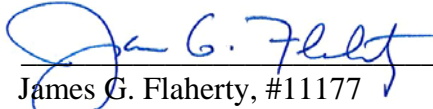
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WHEREFORE, Kansas Gas Service, A Division of ONE Gas, prays the Commission enter an Order permitting its intervention herein and for such other relief as the Commission may deem just and proper.

Respectfully submitted,



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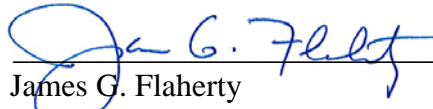
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Attorneys for Kansas Gas Service, A Division of ONE Gas, Inc.

VERIFICATION

STATE OF KANSAS, COUNTY OF FRANKLIN, ss:

James G. Flaherty, of lawful age, being first duly sworn on oath, states that he is attorney for Kansas Gas Service, A Division of ONE Gas, Inc.; that he has read the above and foregoing Petition to Intervene, and the statements contained therein are true.



James G. Flaherty

SUBSCRIBED AND SWORN to before me this 17th day of February, 2017.





Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via U.S. Mail, postage prepaid, hand-delivery, or electronically, this 17th day of February, 2017, addressed to:

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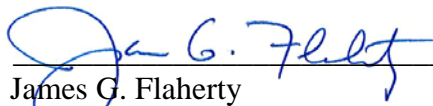
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