

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of)	
Great Plains Energy Incorporated, Kansas)	
City Power & Light Company, and)	Docket No. 18-KCPE-095-MER
Westar Energy, Inc. for Approval of the)	
Merger of Westar Energy, Inc. and)	
Great Plains Energy Incorporated)	

**PETITION OF KANSAS CITY, KANSAS BOARD OF
PUBLIC UTILITIES TO INTERVENE**

The Kansas City, Kansas Board of Public Utilities (“BPU”) submits this petition and moves the Corporation Commission of the State of Kansas (“the Commission”) for an order pursuant to K.S.A. 77-521 and K.A.R. 82-1-225 permitting the BPU to intervene in Docket No. 18-KCPE-095-MER. In support of its petition, the BPU alleges and states as follows:

I. PETITION TO INTERVENE

1. On August 25, 2017 Great Plains Energy Incorporated (“GPE”), Kansas City Power & Light (“KCP&L”), and Westar Energy, Inc. and Kansas Gas and Electric Company (“Westar”) (collectively the “Joint Applicants”) filed their Application seeking Commission approval for the merger of GPE and Westar. GPE is the parent company of KCP&L.

2. The BPU is a non-profit, municipally owned electric and water utility organized under the laws of the state of Kansas. The BPU supplies electric power and energy to more than 64,000 residential, commercial and industrial customers within its 127 square mile service area in Wyandotte County, Kansas. The BPU had a peak load of 485,000 kW in 2015. The BPU is an administrative agency of the Unified Government of Wyandotte County and Kansas City, Kansas.

3. Pursuant to K.S.A. Section 77-521(a)(2), an intervention shall be granted if the petition illustrates that the petitioner's "legal rights, duties, privileges, immunities or other legal interests may be substantially affected by the proceeding." For the reasons discussed below, any decision on the Joint Application will substantially affect the BPU, and no other party can properly represent the BPU's interests.

4. The BPU is interconnected with both KCP&L and Westar. Further, the BPU is a Southwest Power Pool ("SPP") customer in both the Westar transmission zone, and the KCP&L transmission zone.

5. Given its geographic location, the BPU is wholly dependent upon transmission service over KCP&L's and Westar's transmission facilities for deliveries of power and energy from BPU resources located outside of its service territory. This includes the BPU's access to preference power from the Western Area Power Administration and Southwestern Power Administration, and a variety of resources, including hydro, wind, and biogas renewable resources that the BPU requires to meet its load reliably and competitively.

6. The BPU owns 17% of the Dogwood Generating Facility ("Dogwood"), which is located southeast of Kansas City. Dogwood is interconnected to KCP&L, but utilizes Westar as the Energy Manager.

7. The BPU was granted full intervention status as a party to the Joint Applicants' initial transaction in Docket No. 16-KCPE-593-ACQ, by Commission Order issued September 15, 2016.

8. The BPU continues to evaluate the Joint Application, and reserves the right to raise additional issues and submit further comment as that evaluation continues.

II. COMMUNICATIONS

9. All communications and correspondence with the BPU should be sent to the following individuals:

Angela Lawson
Deputy Chief Counsel
Kansas City Board of Public Utilities
540 Minnesota Avenue
Kansas City, KS 66101
Tel: (913) 573-9032
alawson@bpu.com

Susan Alig
Assistant Counsel
Unified Government of Wyandotte County
and Kansas City, Kansas
701 North 7th Street
Suite 961
Kansas City, KS 66101
Tel: (913) 573-5243
salig@wycokck.org

Gregg Ottinger (*pending pro hac vice*)
Ashley Bond (*pending pro hac vice*)
Kenneth M. Holmboe (*pending pro hac vice*)
Duncan & Allen
1730 Rhode Island Ave, NW
Suite 700
Washington, D.C. 20036
Tel: (202) 289-8400
Fax: (202) 289-8450
gdo@duncanallen.com
amb@duncanallen.com
kh@duncanallen.com


John Krajewski
JK Energy Consulting, LLC
650 J Street
Suite 108
Lincoln, NE 68508
Tel: 402-440-0227
Fax: 402-438-4322
jk@jkenergyconsulting.com

Jonathan Lesser
Continental Economics, Inc.
6 Real Place
Sandia Park, NM 87047
jlesser@continentalecon.com

Boris Steffen
RSM US LLP
1861 International Drive
Suite 400
McLean, VA 22102
Tel: 703-336-6303
boris.steffen@rsmus.com

WHEREFORE, the BPU requests that the Commission issue an Order granting the BPU's petition to intervene in this matter with full rights of participation and any other relief as the Commission deems to be appropriate.

Respectfully submitted,



Angela J. Lawson, Sup. Ct. No. 16720
Deputy Chief Counsel
Kansas City Board of Public Utilities
540 Minnesota Avenue
Kansas City, KS 66101
Tel: (913) 573-9032
alawson@bpu.com

Dated This 18th day of September, 2017.

VERIFICATION

STATE OF KANSAS)
)
COUNTY OF WYANDOTTE) ss:

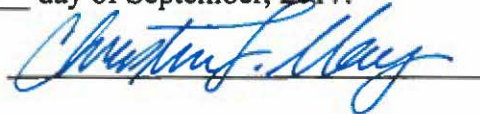
Angela J. Lawson, of lawful age, being first duly sworn upon her oath states:

That she is the Senior Counsel for the proposed Intervenor, Kansas City, Kansas Board of Public Utilities, that he has read the foregoing Petition of Kansas City, Kansas Board of Public Utilities to Intervene, and upon information and belief, states that the matters therein are true and correct.



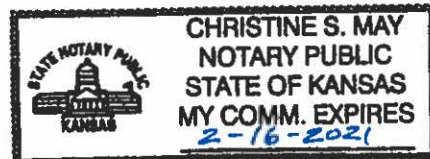
Angela J. Lawson, Sup. Ct. No. 16720

SUBSCRIBED AND SWORN to before me this 18th day of September, 2017.



Notary Public

My Commission expires 2-16-2021



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition of Kansas City, Kansas Board of Public Utilities to Intervene, has been served on the following parties by means of Electronic Service on September 18, 2017:

MICHAEL E. AMASH, ATTORNEY BLAKE & UHLIG PA SUITE 475 NEW BROTHERHOOD BLDG 753 STATE AVE. KANSAS CITY, KS 66101 MEA@BLAKE-UHLIG.COM	MARTIN J. BREGMAN BREGMAN LAW OFFICE, L.L.C. 311 PARKER CIRCLE LAWRENCE, KS 66049 mjb@mjbregmanlaw.com
GLENDA CAFER, ATTORNEY CAFER PEMBERTON LLC 3321 SW 6TH ST TOPEKA, KS 66606 glenda@caferlaw.com	TERRI PEMBERTON, ATTORNEY CAFER PEMBERTON LLC 3321 SW 6TH ST TOPEKA, KS 66606 terri@caferlaw.com
THOMAS J. CONNORS, Attorney at Law CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 tj.connors@curb.kansas.gov	TODD E. LOVE, ATTORNEY CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 t.love@curb.kansas.gov
DAVID W. NICKEL, CONSUMER COUNSEL CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 D.NICKEL@CURB.KANSAS.GOV	DELLA SMITH CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 d.smith@curb.kansas.gov
SHONDA SMITH CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 sd.smith@curb.kansas.gov	DARRELL MCCUBBINS, BUSINESS MANAGER IBEW LOCAL UNION NO. 1464 1760 UNIVERSAL AVENUE KANSAS CITY, MO 64120 kwhiteman@ibew1464.org
DAVID PINON, BUSINESS MANAGER IBEW LOCAL UNION NO. 1613 6900 EXECUTIVE DR SUITE 180 KANSAS CITY, MO 64120 local1613@earthlink.net	RANDY ADAMS, BUSINESS MANAGER IBEW LOCAL UNION NO. 412 1760 UNIVERSAL AVENUE KANSAS CITY, MO 64120 business.manager@ibew412.org
ROBERT J. HACK, LEAD REGULATORY	DARRIN R. IVES, VICE PRESIDENT,

<p>COUNSEL KANSAS CITY POWER & LIGHT COMPANY ONE KANSAS CITY PL, 1200 MAIN ST 31ST FLOOR (64105) PO BOX 418679 KANSAS CITY, MO 64141-9679 ROB.HACK@KCPL.COM</p>	<p>REGULATORY AFFAIRS KANSAS CITY POWER & LIGHT COMPANY ONE KANSAS CITY PL, 1200 MAIN ST 31ST FLOOR (64105) PO BOX 418679 KANSAS CITY, MO 64141-9679 darrin.ives@kcpl.com</p>
<p>ROGER W. STEINER, CORPORATE COUNSEL KANSAS CITY POWER & LIGHT COMPANY ONE KANSAS CITY PL, 1200 MAIN ST 31ST FLOOR (64105) PO BOX 418679 KANSAS CITY, MO 64141-9679 roger.steiner@kcpl.com</p>	<p>NICOLE A. WEHRY, SENIOR REGULATORY COMMUNICATIONS SPECIALIST KANSAS CITY POWER & LIGHT COMPANY ONE KANSAS CITY PL, 1200 MAIN ST 31ST FLOOR (64105) PO BOX 418679 KANSAS CITY, MO 64141-9679 NICOLE.WEHRY@KCPL.COM</p>
<p>ANTHONY WESTENKIRCHNER, SENIOR PARALEGAL KANSAS CITY POWER & LIGHT COMPANY ONE KANSAS CITY PL, 1200 MAIN ST 31ST FLOOR (64105) PO BOX 418679 KANSAS CITY, MO 64141-9679 anthony.westenkirchner@kcpl.com</p>	<p>BRIAN G. FEDOTIN, DEPUTY GENERAL COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 b.fedotin@kcc.ks.gov</p>
<p>DUSTIN KIRK, DEPUTY GENERAL COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 d.kirk@kcc.ks.gov</p>	<p>MICHAEL NEELEY, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 m.neeley@kcc.ks.gov</p>
<p>AMBER SMITH, CHIEF LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 a.smith@kcc.ks.gov</p>	<p>MARK DOLJAC, DIR RATES AND REGULATION KANSAS ELECTRIC POWER CO-OP, INC. 600 SW CORPORATE VIEW (66615) PO BOX 4877 TOPEKA, KS 66604-0877 MDOLJAC@KEPCO.ORG</p>
<p>WILLIAM G. RIGGINS, GENERAL COUNSEL KANSAS ELECTRIC POWER CO-OP, INC. 600 SW CORPORATE VIEW (66615)</p>	<p>ANDREW J. FRENCH, ATTORNEY AT LAW SMITHYMAN & ZAKOURA, CHTD. 7400 W 110TH ST STE 750 OVERLAND PARK, KS 66210-2362</p>

PO BOX 4877 TOPEKA, KS 66604-0877 briggins@kepco.org	andrew@smizak-law.com
JAMES P. ZAKOURA, ATTORNEY SMITHYMAN & ZAKOURA, CHTD. 7400 W 110TH ST STE 750 OVERLAND PARK, KS 66210-2362 jim@smizak-law.com	CATHRYN J. DINGES, SENIOR CORPORATE COUNSEL WESTAR ENERGY, INC. 818 S KANSAS AVE PO BOX 889 TOPEKA, KS 66601-0889 cathy.dinges@westarenergy.com
JEFFREY L. MARTIN, VICE PRESIDENT, REGULATORY AFFAIRS WESTAR ENERGY, INC. 818 S KANSAS AVE PO BOX 889 TOPEKA, KS 66601-0889 JEFF.MARTIN@WESTARENERGY.COM	TIMOTHY E. MCKEE, ATTORNEY TRIPLETT, WOOLF & GARRETSON, LLC 2959 N ROCK RD STE 300 WICHITA, KS 67226 TEMCKEE@TWGFIRM.COM
AMY FELLOWS CLINE, ATTORNEY TRIPLETT, WOOLF & GARRETSON, LLC 2959 N ROCK RD STE 300 WICHITA, KS 67226 amycline@twgfirm.com	JAMES GING, DIRECTOR ENGINEERING SERVICES KANSAS POWER POOL 100 N BROADWAY STE L110 WICHITA, KS 67202 jging@kansaspowerpool.org
LARRY HOLLOWAY, ASST GEN MGR OPERATIONS KANSAS POWER POOL 100 N BROADWAY STE L110 WICHITA, KS 67202 lholloway@kansaspowerpool.org	



Angela J. Lawson