

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of a General Investigation)
Regarding the U.S. Environmental Protection)
Agency’s Final Rule on Carbon Pollution) Docket No. 16-GIME-242-GIE
Emission Guidelines for Existing Stationary)
Sources: Electric Utility Generating Units)

**PETITION TO INTERVENE OF
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 3, 2015, the Commission issued an order opening this docket to investigate the U.S. Environmental Protection Agency’s (“EPA”) Final Rule on Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units.

2. 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.

3. As a vertically integrated electric public utility in the State of Kansas with generating units required to comply with EPA rules regarding emission guidelines, 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 ¶9 of the Commission's December 3, 2015 Order, KCP&L hereby petitions the Commission to participate in this docket and to be placed on the official service list.

4. In addition to signatory counsel, communications and correspondence in regard to this Application should be address to:

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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

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**COUNSEL FOR
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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on this 22nd day of December, 2015, 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 below-named individuals:

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