

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Kansas City Power)	
& Light Company's Practices Regarding)	
Customer Opt-Out of Demand-Side)	EO-2013-0359
Management Programs and Related)	
Issues)	

MIDWEST ENERGY USERS' ASSOCIATION
APPLICATION TO INTERVENE

COMES NOW MIDWEST ENERGY USERS' ASSOCIATION ("MEUA")
and for its Application to Intervene in this matter pursuant to 4
CSR 240-2.075 states:

1. MEUA is an unincorporated voluntary association consisting of large commercial and industrial users of natural gas and electricity served by Kansas City Power and Light Company ("KCPL") and KCP&L Greater Missouri Operations Company ("GMO") in and near Kansas City, Sedalia, and St. Joseph, Missouri and other utility service territories. MEUA was formed for the purpose of group representation of its members' interests through intervention and other activities in regulatory and other appropriate proceedings.^{1/}

^{1/} KCPL and GMO customers potentially affected are: 3M Commercial Graphics; Advantage Metals Recycling LLC; Ag Processing Inc a Cooperative; Bothwell Hospital; EnerSys; Gardner Denver Corporation; General Cable; Hillyard Industries; Land of Lakes; Lifeline Foods, LLC; Maxion Wheels; Nestle Purina Petcare; Noram Ice & Cold Storage; Pittsburgh Corning Corporation; Praxair Inc.; Ventura Foods; Waterloo Industries.

2. MEUA's and its participants' interests in proceedings affecting the rates, terms and conditions of electric service from both KCPL and GMO have been recognized by the Missouri Public Service Commission in permitting intervention in numerous rate design and electric rate proceedings concerning Aquila Inc., KCPL and GMO including without limitation the last series of KCPL and GMO rate increase cases. MEUA also submitted comments in this file at an earlier time before interventions were directed.

3. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

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4. MEUA participants are interested in this proceeding and its possible impact on the rates, terms and conditions of service and Demand Side Management surcharges collected by KCPL and GMO and their impact on operations specifically. As large industrial electric customers of KCPL and GMO, MEUA members may be directly affected by changes in KCPL and GMO opt-out processes under Section 393.1045 and may be bound or adversely affected by any Commission order issued in this proceeding. Their viewpoint will aid the Commission and protect and advance the public interest in these proceedings.

5. For purposes of 4 C.S.R. 240-2.075(2), MEUA opposes discriminatory pricing of electricity and related utility services, and opposes relief that is not reasonable and is not related to prudent actions by the utility in providing utility service. As MEUA representatives have not fully studied the specific proposals that form the core issues in this proceeding, they cannot state a definitive position at this time. However, for purposes of intervention in this proceeding, they are able to state that some of them believe that they have successfully opted out of the charges covered by Section 393.1045 but some have been refused. There has been uncertainty regarding the length of time of such status, the process involved in obtaining opt-out status and notification to customers of the status of their requests. All of these matters are of concern to MEUA members and participants.

WHEREFORE, MEUA prays (without prejudice to later requests for relief): (a) that through MEUA its participants be permitted to intervene herein and be made parties hereto with all rights to have notice of and participate in hearings to present evidence, cross-examine witnesses, file briefs and participate in argument, should any be had; and (b) for all other needful and proper relief appropriate in the premises.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

A handwritten signature in black ink, appearing to read "Stuart W. Conrad", is written over a horizontal line.

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ATTORNEYS FOR MIDWEST ENERGY USERS'
ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Application for Leave to Intervene by electronic mail addressed to the attorneys of record herein as made available by the Secretary of the Commission through EFIS.

A handwritten signature in black ink, appearing to read "Stuart W. Conrad", is written over a horizontal line.

Stuart W. Conrad

March 1, 2013