

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of KCP&L Great Mis-)
souri Operations Company's Submis-)
sion of its 2013 Renewable Energy)
Standard Compliance Report) File No. EO-2014-0290

**APPLICATION TO INTERVENE
OF AG PROCESSING INC A COOPERATIVE**

This application requests intervention in this proceeding for AG PROCESSING INC, A COOPERATIVE ("AGP"). Pursuant to 4 C.S.R. 240-2.075 AGP applies to intervene and to become a party in this proceeding. In support, AGP states:

1. AGP is an agricultural cooperative and is a large manufacturer and processor of soybean meal, soy-related food products, and other grain products throughout the central and upper Midwest, including the State of Missouri. AGP is the largest cooperative soybean processing company in the world, the third-largest supplier of refined vegetable oil in the United States and the third-largest commercial feed manufacturer in North America.

2. AGP operates a major processing facility in St. Joseph, Missouri where it is a major electrical customer of KCP&L Greater Missouri Operations Company (GMO) in the Light & Power service division or district (L&P).

3. AGP's interest in proceedings affecting the rates, terms and conditions of electric services from GMO has been

previously recognized by the Missouri Public Service Commission in permitting AGP's intervention in prior GMO rate cases. AGP has actively participated in such cases.

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

Stuart W. Conrad, Esq.
FINNEGAN, CONRAD & PETERSON, L.C.
1209 Penntower Office Center
3100 Broadway
Kansas City, Missouri 64111
Voice: (816) 753-1122
Fax: (816) 756-0373
E-mail: stucon@fcplaw.com

and to:

Mr. Gary Chesnut
Corporate Purchasing Manager
Ag Processing Inc.
12700 West Dodge Rd.
Omaha, NE 68154

5. On April 15, 2014 GMO filed its 2013 Annual Renewable Energy Standard Compliance Report and requested a waiver of certain requirements of Commission Rules. Initial investigation and review of this filing deserves further investigation and might not be worthy of approval.

6. AGP is vitally interested in issues that are or may be raised by or developed as a result of the investigation of GMO's filing.

7. AGP will be bound or adversely affected by any Commission order in this proceeding. AGP is in the special position of representing its own interest that is direct, immediate, different from that of the general public, and that cannot

adequately be represented by any other party. Therefore, it will aid the Commission and serve and protect the public interest that AGP be permitted to intervene in this proceeding to protect its interests.

8. For purposes of 4 C.S.R. 240-2.075(2), AGP states that it opposes discriminatory and excessive pricing of public utility services, including those provided by GMO and therefore, pending further investigation which cannot be conducted without intervention and access to the tools of discovery under Commission rules, opposes the relief sought by GMO in this proceeding.

WHEREFORE, AGP prays: (a) that it be permitted to intervene and be a party to this case with all rights to have notice of and participate in any proceedings and hearings to present evidence, to cross-examine witnesses, file briefs and present any argument; and (b) for all other relief to which AGP is entitled.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



Stuart W. Conrad Mo. Bar #23966
3100 Broadway, Suite 1209
Kansas City, Missouri 64111
(816) 753-1122
Facsimile (816)756-0373
Internet: stucon@fcplaw.com

ATTORNEYS FOR AG PROCESSING INC.

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing Application to Intervene on the designated attorneys or representatives of each party in accord with Commission Orders and the service list maintained in this proceeding by the Secretary of the Commission on EFIS.

Dated: May 2, 2014

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

Stuart W. Conrad, an attorney for
within applicant