

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

<b>In the Matter of the Resource Plan</b>	<b>)</b>	
<b>of KCP&amp;L Greater Missouri Opera-</b>	<b>)</b>	<b>EO-2012-0324</b>
<b>tions Company</b>	<b>)</b>	

**APPLICATION TO INTERVENE  
BY MIDWEST ENERGY USERS' ASSOCIATION**

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COMES NOW the MIDWEST ENERGY USERS' ASSOCIATION ("MEUA") pursuant to 4 C.S.R. 240-2.075 and applies to intervene herein and become a party for all purposes in respect to the filing herein of an Integrated Resource Plan by KCP&L Greater Missouri Operations Company ("GMO") on April 9, 2012. In support, MEUA states:

1. MEUA is an unincorporated ad-hoc association of large commercial and industrial users of electricity who group together using the MEUA vehicle to combine resources and gain economies in representation and activity in rate and similar cases of concern. For purposes of this case, MEUA participants include Ag Processing Inc a Cooperative (AGP), Lifeline Foods, LLC (Lifeline), and Nestle'-Purina PetCare (Nestle') (all members of the St. Joseph Industrial Intervenor (SJII) in the L&P service territory, and Pittsburgh-Corning Co., Waterloo Industries Inc., Alcan Cable, Enersys, Inc., and Bothwell Regional Health Center (all members of or participants in the Sedalia Industrial Energy Users' Association (SIEUA) in the MPS service territory). Each is a GMO customer and has previously intervened

(individually or through MEUA) and been active in earlier GMO proceedings.<sup>1/</sup>

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

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3. On April 9, 2012 GMO filed its 2012 Integrated Resource Plan (IRP) pursuant to the Commission's Electric Utility Resource Planning rule, 4 CSR 240-22. As stated by the Commission, the purpose of an IRP is to assure that investor-owned electric utilities, such as GMO, properly take into consideration all options to meet their load, including demand-side efficiency and energy management measures, so as to provide safe, reliable and efficient electric service to the public at reasonable rates, in a manner that appropriately serves the public interest.

4. MEUA participants are interested in and will in the future be affected by provisions and the implementation of

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<sup>1/</sup> It is possible that additional participants may ultimately join in this intervention. MEUA commits to the Commission and the parties to promptly identify any such late-joining participants to the Commission and other parties, and put them forward in a manner that would permit timely objection to either their participation or intervention, as the case may be.

GMO's IRP. As larger industrial or commercial customers, their interest is direct, immediate, unique, different from that of the general public, and will not or cannot adequately be represented by any other party. These companies collectively employ hundreds of Missouri residents at their facilities in Missouri, face competitive markets for their respective products, and deal with the cost of energy from GMO on a daily and an intensive basis.

5. Therefore, it will aid the Commission and protect and advance the public interest that each of these companies (identified collectively as MEUA) be permitted to intervene in this proceeding to protect interests which no other party is in a proper position to protect.

6. For purposes of 4 C.S.R. 240-2.075(2), MEUA states that it opposes the discriminatory and non-cost-based pricing of electricity and related utility services. GMO's IRP filing deserves careful review and analysis by the all parties so as to assure that the public interest is served. Detailed analysis of GMO's sizeable application has just begun and MEUA is unable to review certain of the materials that have been designated as Highly Confidential or to be more specific about its position on particular issues at the present time pending that review and analysis.

WHEREFORE, MEUA requests: (a) that it and each of 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.

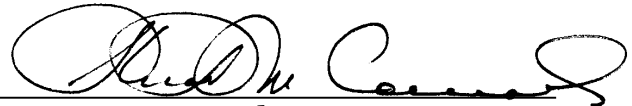


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ATTORNEYS FOR MIDWEST ENERGY USERS'  
ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by electronic means, by United States Mail, First Class postage prepaid, or by hand delivery to all known parties in interest upon their respective representatives or attorneys of record as reflected in the official service list maintained by the Secretary of the Commission on its EFIS.



Stuart W. Conrad

Dated: May 3, 2012