

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

In the Matter of Kansas City Power & Light) **File No. EO-2019-0132**
Company’s Application for Authority to Establish a) Tariff No. JE-2019-0104
Demand-Side Programs Investment Mechanism) Tariff No. YE-2019-0103

In the Matter of KCP&L Greater Missouri Operations)
Application for Authority to Establish a Demand-) **File No. EO-2019-0133**
Side Programs Investment Mechanism) Tariff No. YE-2019-0102

**APPLICATION TO INTERVENE OF
THE MIDWEST ENERGY CONSUMERS GROUP**

COMES NOW the Midwest Energy Consumers Group (“Applicant” or “MECG”), pursuant to 4 CSR 240-2.075 of the Missouri Public Service Commission’s Rules of Practice and Procedure and the Commission’s December 4, 2018 *Order Directing Notice of Application and Order Setting Hearing*, and for its Application to Intervene respectfully states as follows:

1. Midwest Energy Consumers Group is an incorporated association formed to represent the interests of large commercial and industrial users of electricity, gas and water. While many of these entities have opted out of KCPL and GMO’s energy efficiency programs and costs, others are not eligible to opt out of such programs.
2. Correspondence and communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

David L. Woodsmall
Woodsmall Law Office
308 East High Street, Suite 204
Jefferson City, MO 65101
David.woodsmall@woodsmalllaw.com

3. MECG seeks to intervene in this case to preserve the ability of its members to opt out of KCPL and GMO's energy efficiency costs while still participating in curtailment and interruptible programs. As such, MECG's interest in this case is different than that of the general public.

WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicant in these proceedings, Applicant asks that the Commission grant this Application for Intervention, and thereby entitle said Applicant to have notice of and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on the argument, and in all other respects to be made parties to this proceeding.

Respectfully submitted,



David L. Woodsmall, MBE #40747
308 East High Street, Suite 204
Jefferson City, Missouri 65101
(573) 636-6006
Facsimile: (573) 636-6007
david.woodsmall@woodsmalllaw.com

ATTORNEY FOR THE MIDWEST
ENERGY CONSUMERS GROUP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

A handwritten signature in black ink, appearing to read "David L. Woodsmall". The signature is written in a cursive style with a large initial "D" and "W".

David L. Woodsmall

Dated: December 10, 2018