

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

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for)
Approval of a Special Rate for a Facility Whose) **File No. EO-2019-0244**
Primary Industry is the Production or)
Fabrication of Steel in and Around Sedalia,)
Missouri)

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

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

1. Midwest Energy Consumer’s Group (“MECG”) is an incorporated association representing the interests of large commercial and industrial users of electricity.
2. On July 12, 2019, KCPL-GMO filed an application for authority to offer a “special incremental load contract” to the Nucor steel mill in Sedalia, Missouri. As a group of large commercial and industrial customers of KCPL-GMO, MECG’s interest in this case is different than that of the general public.
3. MECG is unable to state its position relating to the relief sought by KCPL-GMO. MECG is continuing to review KCPL-GMO’s filing and reserves the right to take positions on specific issues as this case proceeds.
4. MECG’s intervention will serve the public interest by assisting the record for the Commission’s decision in this case.

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

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WHEREFORE, MECG respectfully requests that the Commission issue its order granting its Application for Intervention and that it be made a party hereto with all rights to participate in this matter.

Respectfully submitted,

/s/ David Woodsmall
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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.

/s/ David Woodsmall
David L. Woodsmall

Dated: July 22, 2019