

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

In the Matter of KCP&L Greater)	
Missouri Operations Company’s)	
Request for Authority to Implement)	Case No. ER-2016-0156
a General Rate Increase for Electric)	
Service)	

**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 the Commission’s February 2, 2016, *Notice of Hearing, Order Setting Conference Date, Directing Notice of Action and Directing Filings*, and for its Application to Intervene respectfully states as follows:

1. The Midwest Energy Consumers Group is an unincorporated association of large users of electricity.¹ The matters to be considered in this case and the Commission’s determinations thereon, could have a direct and significant impact on Applicants’ cost of energy service and the manner in which it is supplied. Therefore, granting this proposed intervention to the Applicants would serve the public interest and would assist the Commission in development of a more complete record. Relevant to this

¹ Currently, for purposes of this case, MECG consists of Walmart Stores, Inc. MECG is in the process of identifying additional members and will notify the Commission at such time as those members become known. Unlike other rate cases, this case is complicated by the fact that GMO proposes to consolidate its MPS and L&P divisions. In such a consolidation, there will be customers that benefit from the consolidation and others that are suffer. Despite repeated assurances from GMO that it would provide individual customer impacts associated with its consolidation proposal, those impacts have not been forthcoming. As such, in order to meet the Commission’s intervention deadline, MECG files this intervention and will seek to learn those customer impacts through the formal discovery process. Once learned, MECG will add further members and inform the Commission.

determination, MECG notes that many of its members have been involved in virtually all of the GMO rate cases for over a decade.

2. As large user customers of KCPL-GMO, the Applicants have a direct and immediate interest in this proceeding that is different from that of the general public. While Applicants do not at this time have sufficient information to assert a position on this investigation, they reserve the right to assert positions after they have had an adequate opportunity to conduct discovery and examine the record, and any documentation of other parties filed herein.

3. 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

WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicants in these proceedings, Applicants ask that the Commission grant this Application for Intervention, and thereby entitle said Applicants 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,



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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.



David L. Woodsmall

Dated: March 14, 2016