

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Fourth Pru-)	
dence Review of Costs Subject to)	
the Commission-Approved Fuel Ad-)	EO-2013-0325
justment Clause of KCP&L Greater)	
Missouri Operations Company.)	

MIDWEST ENERGY USERS' ASSOCIATION
APPLICATION TO INTERVENE

COMES NOW MIDWEST ENERGY USERS' ASSOCIATION ("MEUA")
and for its Application to Intervene in this matter pursuant to 4
CSR 240-2.075 states:

1. MEUA is an unincorporated voluntary association consisting of large commercial and industrial users of natural gas and electricity in and near Sedalia, Missouri and in and near the St. Joseph, Missouri service territory of KCP&L Greater Missouri Operations Company ("GMO"). MEUA was formed for the purpose of group representation of its members' interests through intervention and other activities in regulatory and other appropriate proceedings.

2. For purposes of this case, participating members of MEUA are: **Pittsburgh Corning Corporation**, a manufacturer of cellular glass insulation at its manufacturing facility in Sedalia, Missouri where roughly 160 workers are employed; **Waterloo Industries**, a manufacturer of tool storage equipment and employer of approximately 650 workers at its manufacturing facility in Sedalia, Missouri; **Maxion Wheels** employs roughly 800

workers at its Sedalia, Missouri facility where it manufactures automobile wheels; **EnerSys Inc.** employs approximately 500 persons in its industrial battery manufacturing facility in nearby Warrensburg, Missouri; **Alcan Cable Co.** manufactures aluminum electrical conductors and employs 250 persons in its Sedalia, Missouri operation; **Gardner Denver Corporation** employs 320 workers at its Sedalia works where it makes industrial compressors and blowers; **Bothwell Hospital**, a general care hospital in the Sedalia, Missouri area; **3M Commercial Graphics** an industrial customer located in the GMO service territory in Nevada, Missouri; and **AG Processing Inc a Cooperative**, ("AGP"), an agricultural cooperative and 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 with a major facility located in St. Joseph, Missouri.

3. MEUA's and its participants' interests in proceedings affecting the rates, terms and conditions of electric service from GMO have been recognized by the Missouri Public Service Commission in permitting intervention in numerous rate design and electric rate proceedings concerning Aquila Inc. and GMO including without limitation the last series of GMO rate increase cases where FACs were considered.

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

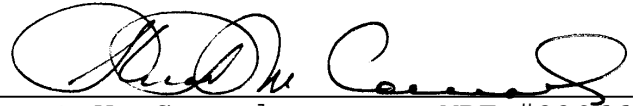
5. MEUA participants are interested in this proceeding and its possible impact on the fuel adjustment clause collected by GMO and its impact on their operations specifically. As large industrial electric customers of GMO, MEUA members may be directly affected by changes in FAC charges and may be bound or adversely affected by any Commission order issued in this proceeding. Because GMO provides electricity to MEUA participants under separate contracts or rate schedules and because of MEUA participants's size and load factors, they are in the special and unique position of representing interests that will not and cannot be represented adequately by other parties and which interests are direct and immediate and differ from that of the general public. Therefore, it will aid the Commission and protect and advance the public interest that MEUA be permitted to intervene in this proceeding so as to protect its members' interest.

6. For purposes of 4 C.S.R. 240-2.075(2), MEUA opposes discriminatory pricing of electricity and related utility services, and opposes relief that is not reasonable and is not related to prudent actions by the utility in providing utility service. MEUA has, however, not presently reviewed the audit materials of the Commission Staff in this matter and has formed no position thereon.

WHEREFORE, MEUA prays (without prejudice to later requests for relief): (a) that through MEUA 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.

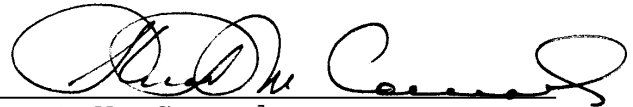


Stuart W. Conrad MBE #23966
3100 Broadway, Suite 1209
Kansas City, Missouri 64111
(816) 753-1122
Facsimile (816) 756-0373
Internet: stucon@fcplaw.com

ATTORNEYS FOR MIDWEST ENERGY USERS'
ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Application for Leave to Intervene by electronic mail addressed to the attorneys of record herein as made available by the Secretary of the Commission through EFIS.



Stuart W. Conrad

December 31, 2012