

**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-2018-0146
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 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 January 30, 2018, KCPL-GMO filed proposed tariffs with the Commission intending to increase its rates for electric service. 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.

4. For purposes of 4 CSR 240-2.075(2), MECG states that it is opposed to discriminatory pricing of electricity and related utility services, is opposed to increases that are not reasonable and are not related to prudent costs that are incurred by the utility in providing utility service, and is opposed to a utility being permitted to earn what may be an unreasonably high rate of return. 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.

5. MECG's intervention will serve the public interest by assisting the record for the Commission's decision in this case.

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

David L. Woodsmall, Esq.
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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,



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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.

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

David L. Woodsmall

Dated: January 30, 2018