

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

In the Matter of the Propriety of the Rate     )  
Schedules for Steam Service of KCP&L     )     File No. HR-2018-0231  
Greater Missouri Operations Company     )

**APPLICATION FOR LATE FILED INTERVENTION  
OF THE MIDWEST ENERGY CONSUMERS GROUP**

COMES NOW the Midwest Energy Consumers Group (“Applicant”), pursuant to 4 CSR 240-2.075 of the Missouri Public Service Commission’s Rules of Practice and Procedure and the Commission’s February 22, 2018 *Order Opening Rate Case, Directing Notice, Establishing Time to Intervene, and Requiring Company to Show Cause Why Its Rates Should Not Be Adjusted*, and for its Application for Late-Filed Intervention respectfully states as follows:

1.     The Midwest Energy Consumers Group is an incorporated association of large commercial and industrial users of electricity, natural gas and steam heat. The matters to be considered in this case and the Commission’s determinations thereon, could have a direct and significant impact on the cost of steam heat service for large industrial customers of KCPL-GMO.

2.     On February 21, 2018, the Staff filed its Motion to Open Rate Case and to Direct Company to Provide Information. That Motion seeks to establish a mechanism to review KCPL-GMO’s steam heat rates in light of the recent implementation of federal legislation reducing the corporate tax rate.

3.     On February 22, 2018, the Commission issued its Order establishing a March 5, 2018 deadline for intervention. Notice of that order was sent to counsel for parties from KCPL-GMO’s last steam heat rate case in 2009 (HR-2009-0092). In the

nine years since KCPL-GMO's last steam heat rate case, much has changed. Relevant to this motion, the firm that represented AG Processing (a party to the last case) has closed its practice and counsel has seemingly retired. For this reason, notice of pending docket never reached the client.

4. Undersigned counsel only recently learned of the pending docket and has been retained to participate in this matter. As such, Applicant maintains that good cause exists for this late-filed application to intervene. Further, Applicant asserts that no party will be prejudiced by this late filed application. Indeed, the only thing that has occurred in this docket is the filing of KCPL-GMO's response to Staff's initiating motion. Therefore, no procedural schedule has been prepared and no testimony has been filed.

5. Granting this proposed intervention to the Applicant would serve the public interest and would assist the Commission in development of a more complete record. Indeed, no other customers have intervened in this matter. As such, Applicant provides a perspective not provided by any of the other parties.

6 Applicant has a direct and immediate interest in these proceedings that is different from that of the general public. While Applicant does 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 examine the record, and any documentation of other parties filed herein.

7. 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 Applicant in this proceeding, Applicant asks that the Commission grant this Late Filed 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,



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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.



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David L. Woodsmall

Dated: March 22, 2018