

**STATE OF MISSOURI  
MISSOURI PUBLIC SERVICE COMMISSION**

<b>In the Matter of KCP&amp;L Greater</b>	)	
<b>Missouri Operations Company's Re-</b>	)	
<b>quest for Authority to Implement a</b>	)	<b>ER-2012-0175</b>
<b>General Rate Increase for Electric</b>	)	
<b>Service</b>	)	

**APPLICATION TO INTERVENE  
OF AG PROCESSING INC, A COOPERATIVE**

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This application requests intervention in this proceeding for AG PROCESSING INC, A COOPERATIVE ("AGP"). Pursuant to 4 C.S.R. 240-2.075 AGP applies to intervene and to become a party in this proceeding. In support, AGP states:

1. AGP is an agricultural cooperative and is a 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. AGP is the largest cooperative soybean processing company in the world, the third-largest supplier of refined vegetable oil in the United States and the third-largest commercial feed manufacturer in North America.

2. AGP operates a major processing facility in St. Joseph, Missouri where it is a major electrical customer of KCP&L Greater Missouri Operations Company (GMO) in the Light & Power service division or district (L&P).

3. AGP's interest in proceedings affecting the rates, terms and conditions of electric services from GMO has been previously recognized by the Missouri Public Service Commission

in permitting AGP's intervention in prior GMO rate cases. AGP has actively participated in such cases.

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  
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E-mail: [stucon@fcplaw.com](mailto:stucon@fcplaw.com)

and to:

Mr. Gary Chesnut  
Corporate Purchasing Manager  
Ag Processing Inc.  
12700 West Dodge Rd.  
Omaha, NE 68154

5. On February 27, 2012 GMO filed proposed tariffs claimed to produce a substantial annual increase for electric service in the L&P service area. Initial investigation and review of these proposed tariffs and the accompanying materials indicates that they have not been shown to be just and reasonable and may be unjust, unreasonable, and unduly discriminatory.

6. AGP is vitally interested in issues that are or may be raised by or developed as a result of the investigation of GMO's filing for an increase in its rates and revenues, including, without limitation, (1) the revenues which will or may be realized under such rates and changes in revenues from former rates in effect before the current filing; (2) the amount and prudence of expenses and purported matching revenues to be

charged to the appropriate test period; and (3) the design and structure of rates needed to raise revenues sufficient to meet a proper cost of service for GMO, particularly in the L&P service area.

7. AGP will be bound or adversely affected by any Commission order in this proceeding. Because of the structure of the rate schedules under which GMO provides AGP with electricity, and because of AGP's size and consistency of usage for production purposes, AGP is in the special position of representing its own interest that is direct, immediate, different from that of the general public, and that cannot adequately be represented by any other party. Therefore, it will aid the Commission and serve and protect the public interest that AGP be permitted to intervene in this proceeding to protect its interests.

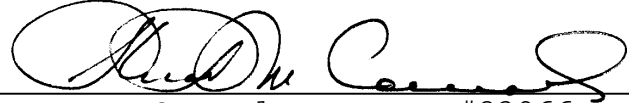
8. For purposes of 4 C.S.R. 240-2.075(2), AGP states that it opposes the discriminatory and excessive pricing of public utility services, including those provided by GMO and therefore, pending further investigation which cannot be conducted without intervention and access to the tools of discovery under Commission rules, opposes the relief sought by GMO in this proceeding.

WHEREFORE, AGP prays: (a) that it be permitted to intervene and be a party to this case with all rights to have notice of and participate in any proceedings and hearings to present evidence, to cross-examine witnesses, file briefs and

present any argument; and (b) for all other relief to which AGP is entitled.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

A handwritten signature in black ink, appearing to read "Stuart W. Conrad", written over a horizontal line.

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ATTORNEYS FOR AG PROCESSING INC.

**CERTIFICATE OF SERVICE**

I certify that I have served a copy of the foregoing Application to Intervene on the designated attorneys or representatives of each party in accord with Commission Orders and the service list maintained in this proceeding by the Secretary of the Commission on EFIS.

Dated: March 7, 2012

A handwritten signature in black ink, appearing to read "Stuart W. Conrad", written over a horizontal line.

Stuart W. Conrad, an attorney for  
within applicant