

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

In the matter of KCP&L Greater)	
Missouri Operations Company's Re-)	
quest for Authority to Implement a)	ER-2012-0175
General Rate Increase for Electric)	
Service)	

**APPLICATION TO INTERVENE
BY MIDWEST ENERGY USERS' ASSOCIATION**

COMES NOW the MIDWEST ENERGY USERS' ASSOCIATION ("MEUA") pursuant to 4 C.S.R. 240-2.075 and applies to intervene herein and become a party for all purposes in respect to the rate increase filing by KCP&L Greater Missouri Operations Company ("GMO") on February 27, 2012. In support, MEUA states:

1. MEUA is an unincorporated ad-hoc association of large commercial and industrial users of electricity who group together using the MEUA vehicle to combine resources and gain economies in representation and activity in these rate cases. For purposes of this case, and including Ag Processing Inc a Cooperative (AGP) (having previously filed to intervene herein), MEUA participants are Nor-Am Ice and Cold Storage, Lifeline Foods, LLC, Energizer Battery, Hillyard Industries, and Nestle-Purina PetCare (all members of the St. Joseph Industrial Intervenor in the L&P service territory (SJII), and Pittsburgh-Corning Co., Waterloo Industries Inc., Maxion Wheels, Inc. (formerly Hayes Lemmerz), Gardner Denver Industrial Products, Alcan Cable, Enersys, Inc., Advantage Metals Recycling, Bothwell Regional

Health Center, and 3M Commercial Graphics Nevada Plant, (all members of or participants in the Sedalia Industrial Energy Users' Association (SIEUA) in the MPS service territory). Each is a GMO customer and has previously intervened (individually or through MEUA) and been active in earlier GMO proceedings.^{1/}

2. 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

3. On February 27, 2012 GMO filed this application to gain Commission approval of a rate increase in the former MPS and L&P divisions.

4. MEUA participants are interested in and will in the future be affected by the relief sought by GMO. As larger industrial or commercial customers, their interest is direct, immediate, unique, different from that of the general public, and will not or cannot adequately be represented by any other party.

^{1/} It is possible that additional participants may ultimately join in this intervention. MEUA commits to the Commission and the parties to promptly identify any such late-joining participants to the Commission and other parties, and put them forward in a manner that would permit timely objection to either their participation or intervention, as the case may be.

These companies collectively employ hundreds of Missouri residents at their facilities in Missouri, face competitive markets for their respective products, and deal with the cost of energy from GMO on a daily and an intensive basis. Therefore, it will aid the Commission and protect and advance the public interest that each of these companies (identified collectively as MEUA) be permitted to intervene in this proceeding to protect interests which no other party is in a position properly to protect.

5. For purposes of 4 C.S.R. 240-2.075(2), MEUA states that it opposes the discriminatory and non-cost-based pricing of electricity and related utility services. GMO's application for authority to increase its electric rates has not been shown to be just, reasonable, or non-discriminatory. However, detailed analysis of GMO's application has just begun and MEUA is unable to be more specific pending that review and analysis of materials that are designated as highly confidential and have not been disclosed to MEUA representatives.

WHEREFORE, MEUA requests: (a) that it and each of 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.

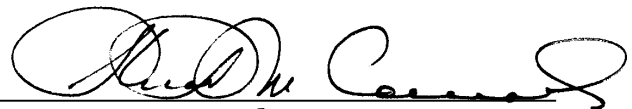


Stuart W. Conrad Mo. Bar #23966
3100 Broadway, Suite 1209
Kansas City, Missouri 64111
(816) 753-1122
Facsimile (816)756-0373
Internet: stucon@fcplaw.com

ATTORNEYS FOR MIDWEST ENERGY USERS'
ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by electronic means, by United States Mail, First Class postage prepaid, or by hand delivery to all known parties in interest upon their respective representatives or attorneys of record as reflected in the official service list maintained by the Secretary of the Commission on the EFIS.



Stuart W. Conrad

Dated: March 16, 2012