

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

In the Matter of the Application of)	
Kansas City Power & Light Company for the)	Case No. EU-2014-0255
Issuance of an Order Authorizing Construction)	
Accounting Relating to its Electrical Operations)	

**APPLICATION TO INTERVENE OF
THE MIDWEST ENERGY CONSUMERS' GROUP**

COMES NOW the Midwest Energy Consumers' Group ("MECG") and, pursuant to 4 C.S.R. 240-2.075, files its application to intervene. For its application, MECG states as follows:

1. MECG is an association of large users of electric energy in the state of Missouri. For purposes of this case, MECG consists of Praxair, Inc., General Mills, NKC Hospital, USG, Ameristar Casino, Cargill, ATK Lake City, Wal-Mart Stores East, L.P. and Sam's East, Inc. As large commercial and industrial customers of KCPL, MECG's interest is different from that of the general public and may be adversely affected by a final order arising from these cases. MECG's interest has been repeatedly recognized by the Commission in recent KCPL cases.

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

David L. Woodsmall
Woodsmall Law Office
807 Winston Court
Jefferson City, MO 65101
Voice: (573) 797-0005
Fax: (573) 635-7523
E-mail: david.woodsmall@woodsmalllaw.com

3. MECG has not formulated a position on the issues in this case. That said, MECG is concerned with any grant of construction accounting without appropriate limitations.

Specifically, construction accounting should not be used to defer costs for an unlimited period of time into the future while KCPL seeks to protect current earnings.

4. MECG's intervention will serve the public interest by assisting the Commission's record for decision.

WHEREFORE, MECG prays: (a) that it be permitted to intervene herein and be made a party 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,

WOODSMALL LAW OFFICE

/s/ David Woodsmall
David L. Woodsmall Mo. Bar #40747
807 Winston Court
Jefferson City, Missouri 65101
(573) 797-0005
Facsimile (573) 635-7523
Internet: david.woodsmall@woodsmallllaw.com

ATTORNEY FOR MIDWEST ENERGY
CONSUMERS' GROUP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served by electronic means on all parties of record as reflected in the records maintained by the Secretary of the Commission through the EFIS system.

/s/ David Woodsmall
David Woodsmall

Dated: June 24, 2014