

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

In the Matter of the Application of Kansas City)
Power & Light Company for Approval to Make) Case No. ER-2009-0089
Certain Changes in its Charges for Electric)
Service to Implement its Regulatory Plan)

**APPLICATION FOR INTERVENTION OF
MIDWEST ENERGY USERS' ASSOCIATION**

COMES NOW the Midwest Energy Users' Association, pursuant to 4 CSR 240-2.075, and for its Application for Intervention in this case, states as follows:

1. Midwest Energy Users' Association ("MEUA") is an unincorporated association consisting of large industrial users of electricity. Members of MEUA include Praxair, Inc.,¹ Alliant Techsystems, Inc., and Wal-Mart Stores, Inc. MEUA believes that additional large industrial users will join in the near future. MEUA will notify the Commission as additional members join.

2. On September 5, 2008, KCPL filed proposed tariffs with the Commission intending to increase its rates for electric service by roughly 17.5%. The claimed reasons for the filing include additions to rate base and increased costs of operations, especially fuel and purchased power costs.

3. As a group of large industrial customers of KCPL, MEUA's interest in this case is different than that of the general public.

4. For purposes of 4 CSR 240-2.075(2), MEUA states that it is opposed to discriminatory pricing of electricity and related utility services, is opposed to increases

¹ Praxair, Inc. is already a party to this case as a result of being a signatory party to the Stipulation and Agreement in Case No. EO-2005-0329. See, *Order Directing Filing and Directing Notice*, issued September 12, 2008, at page 3, ordered paragraph 1.

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. MEUA is unable to state its position relating to the relief sought by KCPL. MEUA is continuing to review KCPL's filing and reserves the right to take positions on specific issues as this case proceeds.

5. MEUA'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:

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WHEREFORE, MEUA 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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ATTORNEYS FOR THE
MIDWEST ENERGY USERS'
ASSOCIATION

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.



David L. Woodsmall

Dated: October 2, 2008