

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

In the Matter of the Application of Great Plains)
Energy Incorporated for Approval of its Merger) File No. EM-2018-0012
with Westar Energy, Inc.)

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

COMES NOW the Midwest Energy Consumer’s Group, pursuant to 4 CSR 240-2.075 and the Commission’s September 6, 2017 *Order Directing Notice and Setting Intervention Date and Procedural Conference* and for its Application for Intervention in this case, states as follows:

1. Midwest Energy Consumer’s Group (“MECG”) is an incorporated association representing the interests of large commercial and industrial users of electricity. Related to this case, MECG includes numerous customers of KCPL and KCP&L GMO.

2. On August 31, 2017, Great Plains Energy filed its Application for Commission approval of its merger with Westar Energy. MECG is vitally interested in any docket designed to address consumer protections associated with any detriment underlying the Great Plains / Westar merger. Indeed, MECG’s interest is demonstrated by the fact that this docket is a direct result of the Complaint filed by MECG claiming that the Commission had jurisdiction over this transaction (Case No. EC-2017-0107).

3. MECG’s intervention will serve the public interest by assisting the record for the Commission’s decision in this case. In this light, MECG intends to issue discovery, file testimony, provide argument and briefs and fully participate in this docket.

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

David L. Woodsmall, Esq.
WOODSMALL LAW OFFICE
308 E. High Street, Suite 204
Jefferson City, Missouri 65101
Voice: (573) 636-6006
Fax: (573) 636-6007
E-mail: david.woodsmall@woodsmalllaw.com

WHEREFORE, MECG 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,

A handwritten signature in black ink, appearing to read "Woodsmall", written in a cursive style.

David L. Woodsmall, MBE #40747
308 E. High Street, Suite 204
Jefferson City, Missouri 65101
(573) 636-6006 (telephone)
(573) 636-6007 (facsimile)
david.woodsmall@woodsmalllaw.com

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.

A handwritten signature in black ink, appearing to read "David L. Woodsmall". The signature is written in a cursive style with a large initial "D".

David L. Woodsmall

Dated: September 7, 2017