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

In the Matter of the Application of KCP&L	)	
Greater Missouri Operations Company for	)	Case No. ER-2010-0356
Approval to Make Certain Changes in its	)	
Charges for Electric Service	)	

## APPLICATION TO INTERVENE BY THE MISSOURI RETAILERS ASSOCIATION

**COMES NOW** the Missouri Retailers Association (hereinafter "Missouri Retailers" or "MRA"), by and through counsel, pursuant to Public Service Commission ("Commission") Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this general rate case.

In support of this Application, the Missouri Retailers state as follows:

- 1. The MRA is a not-for-profit association dedicated to serving the needs of retailers and grocers and their distribution facilities statewide. MRA has several members who are served by KCPL Greater Missouri Operations Company and which rely on dependable electric service at reasonable rates in order to survive in the current economy, in order to employ their workforce, and to continue to provide their products and services at reasonable prices. This interest is different than the general public interest. A list of members is attached as Exhibit A.
- 2. Correspondence, communications, orders and the decision in this matter should be addressed to:

Thomas R. Schwarz, Jr.
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and

David Overfelt, President Missouri Retailers Association

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Jefferson City, MO 65102

Telephone No.: (573) 636-5128

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3. On June 11, 2010, this Commission issued an Order directing interested parties

wishing to intervene to do so by not later than July 1, 2010, and thus this Application is timely.

4. MRA is opposed to any unjust and unreasonable revenue requirement or

discriminatory rate design for its members served by KCP&L's electric service. MRA is also

opposed to KCP&L's request for an interim rate increase in this case. After further investigation,

MRA plans to provide the Commission with a more detailed position on KCP&L's proposals and

testimony submitted in this case.

5. MRA believes that its intervention and participation in this proceeding will present

representative perspective of commercial customers not otherwise represented in the proceeding and

will provide the Commission with the position of an important sector of Missouri's economy.

MRA's intervention would therefore serve the public interest, and should become a party to this case

for all purposes.

WHEREFORE, the MRA respectfully requests that the Commission grant its Application

to Intervene, entitling it to fully participate in this proceeding.

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Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By:

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## **CERTIFICATE OF SERVICE**

I hereby certify that a correct copy of the above Application to Intervene by the Missouri Retailers Association was served electronic transmission on this 1<sup>st</sup> day of July, 2010, to the following parties of record:

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## Missouri Retailers Association members (

ABBCO Service Corporation

Accu-Care, Inc.,

Aldi

All-Staff Nursing, Inc.

Altria Client Services, Inc.

Ameristaff

Best Buy Co., Inc.

BF&B Enterprises

BKC, Inc. dba Schottzies Bar & Grill

Buch Mufflers, Inc. dba Midas Auto Service Experts et al

Busch's Florist

C & F Restaurants, LLC dba PJ's Tavern

CFM of Mid-MO dba Convenient Food-Mart

Community Living Inc.

Cooperative Attendant Services, Inc.

Crossings Restaurant LLC, The

**CVS Pharmacy** 

CWE Hospitality Services LLC dba Chase Park Plaza

D.E. Enterprises, Inc. dba St. Louis Staffing

Dee Lee Group The, LLC dba Giggers Riverfront Party Bar & Grill

Demac Equipment Corporation

Dierberg Markets, Inc.

Epworth Children & Family Services

Excel Home Care, Inc.

Forever Network, Inc.

Grace Hill Neighborhood Health Centers

Grace Hill Settlement House

Habcare, Inc.

HD Sports, Inc. dba Sports Café

Hewitt-Lucas Body Company, Inc.

Home Depot, The

J. C. Penney Co., Inc.

Jefferson City Oil Co., Inc.

Jerry Haas Race Cars Inc.

Jewish Center for the Aged

Judevine Center for Autism

Kaldi's Inc.

Karl Bissinger Inc.

KEW Properties dba Sub Shop, Inc.

Lift for Life Academy & Gym, Inc.

Lift for Life Gym, Inc.

Liston Enterprises, Inc. dba Seamus McDaniels

Lowell Manufacturing Company

Lowe's Companies, Inc.

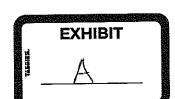
Macy's

Madelaine Townhomes

Medve Group, Inc., The

Metro Home Inspections, Inc.

Metropolitan Design & Building Co., Inc.



Missouri Baptist Children's Home

Missouri Grocers Assn.

Mt. Washington Forever Cemetery (MWC Inc.)

Northstar Battery Co., LLC

Nurses for Newborns Foundation

Old Town Donuts

Pepsi-Cola Bottling Company of New Haven

Physicians Optical Service

Pike County Memorial Hospital

Progressive Ballons, Inc.

QuikTrip Corporation

Red Shed, The

Reliant Care Mgt. Co. LLC

Schnuck Markets, Inc.

Schulte's Fresh Foods

SDM Company dba Culinary Personnel

Sears Holdings Corporation

Sentinel Industries, Inc.

**Target Stores** 

Village Bar Inc., The

Walgreen Co.

West Missouri Beef LLC

Wilco Development & Marketing dba Helco Tool & Gage

Woodard Cleaning & Restoration Services