

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

Staff of the Public Service Commission of the)	
State of Missouri)	
)	Docket No. EU-2015-0094
v.)	
)	
Kansas City Power & Light Company,)	

**APPLICATION FOR INTERVENTION OF
MIDWEST ENERGY CONSUMER’S GROUP**

COMES NOW the Midwest Energy Consumer’s Group, pursuant to 4 CSR 240-2.075 and the Commission’s October 15, 2014 Order Directing Notice and Order Directing Kansas City Power & Light Company to File a Response, and for its Application for Intervention in this case, states as follows:

1. Midwest Energy Consumer’s Group (“MECG”) is an unincorporated association consisting of large commercial and industrial customers of KCPL. Members of MECG include, but are not limited to, Praxair, Inc., Wal-Mart Stores, Inc., Cargill Incorporated, North Kansas City Hospital, and General Mills. MECG was a party to KCPL’s most recent rate case.

2. On October 9, 2014, the Staff of the Public Service Commission (“Staff”) filed a Petition to require KCPL to defer the savings associated with a recent court decision precluding the Department of Energy from collecting a surcharge on nuclear spent fuel. Recognizing that such an event is extraordinary, the savings should be properly deferred and returned to ratepayers.

3. MECG’s intervention will serve the public interest by assisting the record for the Commission’s decision in this case.

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, MO 65101
573-635-6006 (telephone)
573-635-6007 (facsimile)
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 "David L. Woodsmall". The signature is stylized and cursive.

David L. Woodsmall, MBE #40747
308 E. High Street, Suite 204
Jefferson City, MO 65101
573-635-6006 (telephone)
573-635-6007 (facsimile)
Email: 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" and "W".

David L. Woodsmall

Dated: October 24, 2014