

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

In the Matter of KCP&L Greater Missouri Operations)
Company's 2018 Triennial Compliance Filing) File No. EO-2018-0038
Pursuant to 4 CSR 240-22.)

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

COMES NOW the Midwest Energy Consumers Group ("Applicants" or "MECG"), pursuant to 4 CSR 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure and the Commission's April 4, 2018 *Order Directing Notice and Setting Deadline for Submission of Intervention Requests*, and for its Application to Intervene respectfully states as follows:

1. The Midwest Energy Consumers Group is an incorporated association representing the interests of large commercial and industrial users of electricity in the service areas of Missouri public utilities including KCP&L Greater Missouri Operations Company (GMO).

2. The matters to be considered in this case and the Commission's determinations thereon, could have a direct and significant impact on Ameren's cost of electric service and the manner in which it is supplied. Therefore, granting this proposed intervention to the Applicant would serve the public interest and would assist the Commission in development of a more complete record.

3. As a representative of large user customers of GMO, the Applicant has a direct and immediate interest in this proceeding that is different from that of the general public. To this point, MECG has been granted intervention in GMO's last several rate proceedings. While Applicant does not at this time have sufficient information to assert a

position on this investigation, it reserves the right to assert positions after it has had an adequate opportunity to examine the record, and any documentation of other parties filed herein.

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

David L. Woodsmall
Woodsmall Law Office
308 East High Street, Suite 204
Jefferson City, MO 65101

WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicant in this proceeding, Applicant asks that the Commission grant this Application for Intervention, and thereby entitle said Applicant to have notice of and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on the argument, and in all other respects to be made parties to this proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David L. Woodsmall", with a large, stylized initial "D" and "W".

David L. Woodsmall, MBE #40747
308 East High Street, Suite 204
Jefferson City, Missouri 65101
(573) 797-0005 (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", written in a cursive style.

David L. Woodsmall

Dated: April 11, 2018