

**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)
Certain Changes in its Charges for Electric) Case No. ER-2010-0355
Service to Continue the Implementation of)
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 the Commission's June 11, 2010 *Order and Notice*, 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 commercial and industrial users of electricity. Members of MEUA include Alliant Techsystems, Inc., Wal-Mart Stores, Inc., United States Gypsum Company, LaFarge North America, Inc., and Cargill Incorporated.¹ MEUA believes that additional large commercial and industrial users may join in the near future. MEUA will notify the Commission as additional members join.

2. On June 4, 2010, KCPL filed proposed tariffs with the Commission intending to increase its rates for electric service by \$92.1 million, approximately 13.8%. As a group of large commercial and 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 Undersigned counsel has previously entered their appearance on behalf of Praxair, Inc. As a signatory to the KCPL Regulatory Plan, Praxair is granted automatic party status in this proceeding. As such, Praxair is already a separate party and is not considered an entity within MEUA.

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: July 1, 2010