

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

In the Matter of Kansas City)	
Power & Light Company's Request)	Case No. ER-2012-0174
for Authority to Implement a General)	
Rate Increase for Electric Service)	

**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 February 28, 2012 *Order Suspending Tariff, Setting Prehearing Conference, and Directing Filings; and Notice of Contested Case and Hearings*, 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 users of electricity. Members of MECG include Alliant Techsystems, Inc., Wal-Mart Stores, Inc., United States Gypsum Company, Cargill Incorporated, North Kansas City Hospital, and Ameristar Casino. MECG believes that additional large commercial and industrial users may join in the near future. MECG will notify the Commission as additional members join.

2. On February 27, 2012, KCPL filed proposed tariffs with the Commission intending to increase its rates for electric service by \$105.7 million, approximately 15.1%. As a group of large commercial and industrial customers of KCPL, MECG's interest in this case is different than that of the general public.

4. For purposes of 4 CSR 240-2.075(2), MECG states that it is opposed to discriminatory pricing of electricity and related utility services, is opposed to increases

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. MECG is unable to state its position relating to the relief sought by KCPL. MECG is continuing to review KCPL's filing and reserves the right to take positions on specific issues as this case proceeds.

5. MECG'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, 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,



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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.



David L. Woodsmall

Dated: March 19, 2012