

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

In the Matter of Kansas City	)	
Power & Light Company's Request	)	Case No. ER-2014-0370
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 Consumers' Group, pursuant to 4 CSR 240-2.075 of the Commission's Rules of Practice and Procedure and the Commission's October 31, 2014 *Order Directing Notice, Setting Intervention Deadline, and Setting Procedural Conference*, 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. For purposes of this case, members of MECG include Alliant Techsystems, Inc.; Wal-Mart Stores, Inc.; United States Gypsum Company; Cargill, Incorporated; North Kansas City Hospital; Central Plains Cement Company, LLC.; General Mills Operations, LLC.; Ameristar Casino Kansas City, Inc.; Praxair, Inc.; Little Blue Valley Sewer District; DST Realty, Inc.; Broadway Square Partners, LLP; Show-Me Ethanol, LLC.; and Cosentino's Service Corp., Inc. Cumulatively, MECG members constitute almost one-third of the usage from KCPL's Large Power rate schedule as well as some of KCPL's largest customers on the Large General Service rate schedule. MECG believes that additional large commercial and industrial users may join in the near future. As required by

Commission Rule 2.075(10), MECG will notify the Commission as additional members join.

2. On October 30, 2014, KCPL filed proposed tariffs with the Commission intending to increase its rates for electric service by \$120.9 million, approximately 15.75%. This increase comes shortly after five other recent rate cases which increased KCPL rates by 56.9%. Therefore, with this proposed increase, KCPL rates will have increased by 81.5% in eight years. Given the magnitude of their usage, the MECG members will realize a greater portion of the rate increase (in nominal dollars) than members of the general public. As such, 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 is currently 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 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. MECG intends to submit testimony and evidence on issues related to revenue requirement, class cost of service, rate design and KCPL's request for a fuel adjustment clause and other trackers.

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,



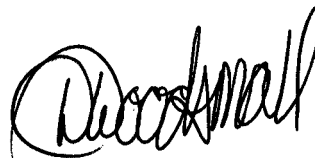
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ATTORNEY FOR THE MIDWEST ENERGY  
CONSUMERS' GROUP

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.



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David L. Woodsmall

Dated: November 20, 2014