

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

In the Matter of the Resource Plan of)
KCP&L Greater Missouri Operations Company) **File No. EO-2012-0324**

APPLICATION TO INTERVENE

COMES NOW the Midwest Energy Consumer's Group, pursuant to 4 CSR 240-2.075 and the Commission's April 12, 2012 *Order Directing Notice and Setting Date for Submission of Intervention Requests*, 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 Wal-Mart Stores, Inc.

2. On April 9, 2012, KCP&L Greater Missouri Operations (“GMO”) filed its 2012 Integrated Resource Plan.

3. As noted in the Commission’s integrated resource planning rules, “the fundamental objective of the resource planning process at electric utilities shall be to provide the public with energy services that are safe, reliable, and efficient, at just and reasonable rates.” (4 CSR 240-22.010(2)). The rule continues to direct that the “primary selection criterion in choosing the preferred resource plan” shall be the “minimization of the present worth of long-run utility costs.” (4 CSR 240-22.010(2)(B)). Therefore, the reliability of the service provided by GMO and the rates charged for that service are affected by the planning processes used by GMO within its integrated resource plan. As such, customers such as MECG may be affected as a result of this case.

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

5. 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, MEEG 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", written in a cursive style.

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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.

A handwritten signature in black ink, appearing to read "David L. Woodsmall", written in a cursive style.

David L. Woodsmall

Dated: April 18, 2012