

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

In the Matter of Kansas City)	
Power & Light Company's Practices)	
Regarding Customer Opt-Out of)	Case No. EO-2013-0359
Demand-Side Management Programs)	
and Related Issues)	

**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 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. Many of these commercial and industrial users have either opted out of KCPL's energy efficiency costs or are large enough to opt out of such costs. MECG was a party to KCPL's recent rate case. Relevant to the immediate inquiry, MECG has appealed the Commission's order in that case because of its failure to segregate energy efficiency costs such that those costs will not be charged to opt-out customers.

2. As large customers, MECG members are interested in any Commission decision addressing the rights of opt out customers. In fact, demonstrating its interest, MECG has already filed comments in this docket on February 14, 2013. As such, EFIS already reflects MECG as a party. That said, MECG has never formally intervened.

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

4. 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,

A handwritten signature in black ink, appearing to read "David Woodsmall", written over a horizontal line.

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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". The signature is stylized with a large, circular initial "D" and a long, sweeping horizontal stroke at the end.

David L. Woodsmall

Dated: March 1, 2013