

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

In the Matter of the Application of Kansas City)	
Power & Light Company and KCP&L Greater)	
Missouri Operations Company for the Issuance)	File No. EU-2014-0077
Of an Accounting Authority Order relating to their)	
Electrical Operations and for a Contingent Waiver)	
Of the Notice Requirement of 4 CSR 240-4.020(2))	

**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 customers of KCPL and GMO. Members of MECG include, but are not limited to, Alliant Techsystems, Inc., Praxair, Inc., Wal-Mart Stores, Inc., United States Gypsum Company, Cargill Incorporated, North Kansas City Hospital, Maxion Wheels, and KC Summit Technology. MECG was a party to both KCPL and GMO’s recent rate cases.

2. On September 20, 2013, Kansas City Power & Light Company (“KCPL”) and KCP&L Greater Missouri Operations Company (“GMO”) filed for Commission authorization to implement an accounting authority order (“AAO”). Under the proposed AAO, KCPL and GMO ask to be allowed to capture any changes in transmission costs and recognize those costs in the test period of a future rate case. The practical effect of this request is to inflate the KCPL and GMO revenue requirements in the next case by destroying the proper test year matching of expenses, revenues and rate base. In addition, KCPL and GMO fail to recognize increasing revenues and decreasing expenses that have occurred that serve to offset this single item of increasing cost. For instance, immediately

following the resolution of the last rate case, KCPL and GMO refinanced a significant amount of short-term debt. This refinancing immediately caused a significant reduction in KCPL and GMO's cost of capital. Nevertheless, KCPL and GMO ignore this decreased expense item. Recognizing that the KCPL and GMO's request for an AAO violates the criteria for the granting of an AAO, serves the single purpose of inflating those utilities' revenue requirement and fails to recognize other offsetting expense and revenue changes, MECG is opposed to the KCPL and GMO request.

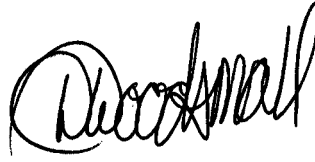
3. MECG's intervention will serve the public interest by assisting the record for the Commission's decision in this case.

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,



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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: October 2, 2013