

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

AG PROCESSING, INC.,)	
)	
Complainant,)	
)	
vs.)	Case No. HC-2012-0259
)	
KCP&L GREATER MISSOURI,)	
OPERATIONS COMPANY,)	
)	
Respondent.)	

**TRIUMPH FOODS, L.L.C.'S SUPPLEMENT TO
ITS MOTION TO INTERVENE**

Pursuant to the Commission's Notice of April 19, 2012, Intervenor Triumph Foods, L.L.C., states as follows:

1. Triumph Foods first learned of this matter on March 12, 2012, when it was approached by Complainant AG Processing, Inc., about the possibility of intervening in the matter. At that point, more than 30 days had elapsed since the Commission's Order Giving Notice of the Case.
2. Triumph Foods engaged in an investigation of the legal and factual issues, and also engaged in conversations with Complainant about the possibility of sharing counsel. After those discussions it became apparent that sharing counsel was not feasible because of certain conflict issues.
3. Triumph Foods then sought independent counsel. The undersigned law firm was approached in late March but in order to pursue the matter had to resolve

conflicts with other parties. Undersigned counsel received written notice that the conflicts were resolved on April 18, 2012.

4. Triumph Foods filed its Motion to Intervene that day.

5. These facts constitute good cause for the Motion to be filed more than thirty (30) days after the Commission's Order Giving Notice of the Case.

WHEREFORE, Triumph Foods respectfully requests that its Motion to Intervene be granted.

Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Lowell D. Pearson
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ATTORNEYS FOR TRIUMPH FOODS

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been electronically mailed to all counsel of record this 25th day of April, 2012.

/s/ Lowell D. Pearson