## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

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In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service

Case No. ER-2014-0370

## **APPLICATION TO INTERVENE**

**COMES NOW** Laclede Gas Company d/b/a Missouri Gas Energy ("MGE") and, pursuant to Commission Rule 4 CSR 240-2.075, files its Application to Intervene, respectfully stating as follows:

1. MGE is an operating unit of Laclede Gas Company, which is duly incorporated under the laws of the State of Missouri and conducts business in its MGE service territory under the fictitious name of Missouri Gas Energy. Laclede's principal office is located at 720 Olive Street, St. Louis, Missouri 63101. MGE's principal office is located at 3420 Broadway, Kansas City, Missouri 64111. A Certificate of Good Standing evidencing Laclede's standing to do business in Missouri was submitted in Case No. GF-2009-0450 and is incorporated herein by reference for all purposes. The information in such Certificate is current and correct.

2. Other than cases that have been docketed at the Commission, neither MGE nor Laclede Gas Company has a pending action or final unsatisfied judgment against it from any state or federal agency or court within the past three (3) years that involve customer service or rates. Neither Laclede nor MGE has annual reports or assessment fees that are overdue. 3. MGE provides natural gas service to approximately 500,000 customers in the western Missouri counties of Andrew, Barry, Barton, Bates, Buchanan, Carroll, Cass, Cedar, Christian, Clay, Clinton, Dade, Dekalb, Greene, Henry, Howard, Jackson, Jasper, Johnson, Lafayette, Lawrence, McDonald, Moniteau, Pettis, Platte, Ray, Saline, Stone, and Vernon.

4. MGE is subject to the jurisdiction of the Missouri Public Service Commission as provided by law.

5. Communications in regard to this Application should be addressed to the undersigned counsel and to:

Michael R. Noack Director, Pricing and Regulatory Affairs Missouri Gas Energy 3420 Broadway Kansas City, Missouri 64111 816-360-5560 Fax: 816-360-5536 E-mail: michael.noack@thelacledegroup.com

6. On October 30, 2014, Kansas City Power & Light Company ("KCPL") filed tariff sheets implementing a general rate increase for retail electric service customers in its Missouri service area. On October 31, the Commission issued an order that, among other things, set a deadline of November 20 for the filing of applications to intervene.

7. MGE should be allowed to intervene in this proceeding because MGE has an interest that is different from that of the general public, and that may be adversely affected by a final order in this case. As a local natural gas distribution company that provides gas sales and service in territories that substantially overlap and compete with KCPL, MGE's services and demand side efforts are interrelated with those of KCPL. MGE's interest in this proceeding

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relates primarily to issues in the areas of class cost of service, rules of service, rate design and demand side management.

8. Granting intervention to MGE would serve the public interest. MGE's status as a public utility and its direct, specific interests in the subjects of this proceeding could improve the record and benefit the Commission in reaching decisions in this case.

9. The Commission has consistently recognized MGE's interest in other KCPL rate cases and granted MGE's request for intervention, including Case numbers ER-2006-0314, ER-2007-0291, ER-2009-0089, ER-2010-0355, and ER-2012-0174.

10. Until MGE has had an opportunity to more fully evaluate the testimony and recommendations presented in this case, it is unable to take a position at this time on the relief sought in this proceeding.

**WHEREFORE,** for the foregoing reasons, MGE respectfully requests that the Commission issue its order granting this Application to Intervene and permitting MGE to intervene and participate as a party in all respects in this proceeding.

Respectfully requested,

#### /s/ Rick Zucker

Rick Zucker #49211 Associate General Counsel Laclede Gas Company d/b/a Missouri Gas Energy 720 Olive Street, 14<sup>th</sup> Floor St. Louis, MO 63101 (314) 342-0533 Phone (314) 421-1979 Fax Rick.zucker@thelacledegroup.com

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# **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Application to Intervene has been duly served upon the parties to this case by email, facsimile, United States mail, postage prepaid, or by hand delivery, on this 19th day of November, 2014.

/s/ Marcia Spangler

### **VERIFICATION**

STATE OF MISSOURI ) ) SS. CITY OF ST. LOUIS )

I, Rick Zucker, being first duly sworn, verify that I am an attorney for Laclede Gas Company d/b/a Missouri Gas Energy. I am licensed to practice law in the State of Missouri and have been authorized to file the foregoing Application to Intervene, which is correct to the best of my knowledge, information and belief.

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Subscribed and sworn to before me this 19th day of November, 2014.

My Commission expires: <u>//. 7. 2015</u>

LISA M. REED Notary Public - Notary Seal STATE OF MISSOURI St. Charles County My Commission Expires: Nov. 7, 2015 Commission # 11265169