BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of KCP&L Greater Missouri Operations)	
Company's Request for Authority to Implement a)	Case No. ER-2016-0156
General Rate Increase for Electric Service)	

APPLICATION TO INTERVENE OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

Comes now the Missouri Industrial Energy Consumers or "MIEC" and, pursuant to 4 C.S.R. 240-2.075, and the Commission's March 3 *Notice of Hearing; Order Setting Conference Date, Directing Notice of Action, and Directing Filings* files its Application to Intervene. In support of its Application, the MIEC states as follows:

- 1. The MIEC is a Missouri corporation, and some of its members are large industrial customers of KCP&L Greater Missouri Operations ("GMO").
- 2. As large industrial customers of GMO, the interests of the MIEC and its members are different than that of the general public and may be adversely affected by a final order arising from this case.
- 3. The MIEC and its members may oppose the relief sought by GMO in this case, and reserve the right to take positions on specific issues as this case proceeds.
- 4. The MIEC's intervention will serve the public interest by assisting the Commission's record for decision in this case.

WHEREFORE, the MIEC requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully submitted,

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By:/s/ Edward F. Downey

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Attorneys for The Missouri Industrial Energy Consumers

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 17th day of March, 2016, to all parties on the Commission's service list in this case.

/s/ Edward F. Downey