BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Midwest Energy Consumers Group,)
Complainant,)
V.) Case No. EC-2017-0106
Westar Energy, Inc.,)
Respondent.)

<u>APPLICATION TO INTERVENE BY THE CONSUMERS COUNCIL OF MISSOURI</u>

COMES NOW the Consumers Council of Missouri ("Consumers Council" or "CCM"), by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this complaint case, initiated by Midwest Energy Consumers Group on October 11, 2016.

In support of this application, Consumers Council states as follows:

1. Consumers Council is a non-governmental, nonpartisan, nonprofit corporation that is dedicated to educating and empowering consumers statewide and to advocating for their interests. Consumers Council of Missouri was originally founded in 1971 as Utility Consumers Council of Missouri, and has participated in numerous cases at the Missouri Public Service Commission ("Commission"), including previous KCPL rate cases.

2. Correspondence, communications, orders and the decision in this matter

should be addressed to:

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3. Consumers Council's interest in this matter relates to the rates, terms and

conditions of service for the Company's residential electric customers. This interest is

different than the general public interest represented by the Office of the Public Counsel.

4. Consumers Council believes strongly in just and reasonable regulation of

monopoly utilities, which includes appropriate regulatory review of mergers and

acquisitions involving regulated Missouri utilities in order to ensure that no public

detriments result from such transactions. Consumers Council believes just as strongly

in the principal of transparent regulation, which allows for a full and fair public

examination of those merger and acquisitions that involve Missouri utilities or the

corporations that control those utilities.

Consumers Council reserves the right to provide the Commission with more

detailed positions in this rate case, following further review of the testimony and

supporting materials.

5. Consumers Council believes that its intervention and participation in this

proceeding would serve the public interest, and wishes to become a party to this case

for all purposes.

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WHEREFORE, Consumers Council respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

Dated: October 23, 2016 /s/ John B. Coffman

John B. Coffman MBE #36591

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Attorney for Consumers Council of Missouri

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list on this 23rd day of October, 2016.

/s/ John B. Coffman