

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

In the Matter of the Exploration of a Joint	)	
Proceeding with the Kansas Corporation	)	
Commission to Investigate the Off-System	)	Case No. EO-2012-0020
Sales Allocation Methods of Kansas City	)	
Power & Light Company	)	

**APPLICATION TO INTERVENE WITH ADDITIONAL PARTIES OF  
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Comes now Anheuser-Busch Companies, Inc., Bayer Cropscience, BioKyowa, Inc., The Boeing Company, Doe Run, Enbridge, Explorer Pipeline, Ford Motor Company, General Motors Corporation, GKN Aerospace, Hussmann Corporation, JW Aluminum, MEMC Electronic Materials, Metal Container Corporation, Monsanto, National Starch, Procter & Gamble Company, Nestlé Purina PetCare, Noranda Aluminum, Ozark Pipeline Company, Saint Gobain, and Solutia (referred to herein as the Missouri Industrial Energy Consumers or “MIEC”) and, pursuant to 4 C.S.R. 240-2.075 and the Commission’s August 9, 2011 *Second Order Directing Filing* in this case, file their application to intervene. For their application, the MIEC and its individual members state as follows:

1. The MIEC is a Missouri corporation, and the members of the MIEC are large industrial customers of either Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) or Kansas City Power & Light Company (“KCPL”).

2. As large industrial customers of Ameren Missouri and KCPL, the interests of the MIEC in the allocation of off-system sales margins 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 do not yet have a position on the issues in this case and reserve the right to take positions on specific issues as this case proceeds.

4. Intervention by the MIEC and its members 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,

BRYAN CAVE, LLP

By: /s/ Diana Vuylsteke

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Energy Consumers

#### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 16<sup>th</sup> day of August, 2011, to all parties on the Commission's service list in this case.

/s/ Diana Vuylsteke