

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

In the Matter of Great Plains Energy Incorporated for ) Case No. EM-2018-0012  
Approval of its Merger with Westar Energy, Inc. )

**APPLICATION TO INTERVENE BY THE CONSUMERS COUNCIL OF MISSOURI**

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 the above-styled case.

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 potential detriments that may result to *residential* electric customers from the proposed merger of Westar Energy and Great Plains Energy, the owner of Kansas City Power & Light Company. 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 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 which involve Missouri utilities or the corporations that control those utilities.

6. Consumers Council believes that the public deserves a full and complete hearing to review the joint application and all aspects of the proposed merger, including adequate time to analyze this proposal. 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.

7. 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.

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

Respectfully submitted,

/s/ John B. Coffman

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Attorney for Consumers Council of Missouri

Dated: September 28, 2017

## **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 28<sup>th</sup> day of September, 2017.

/s/ John B. Coffman

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