

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Kansas City Power)	
& Light Greater Missouri Operations)	
Company Application for Approval of)	<u>File No. EO-2012-0009</u>
Demand-Side Programs and for Au-)	
thority to Establish a Demand-Side)	
Investment Mechanism)	

**APPLICATION TO INTERVENE OF
SEDALIA INDUSTRIAL ENERGY USERS' ASSOCIATION
AND AG PROCESSING INC A COOPERATIVE**

COME NOW the SEDALIA INDUSTRIAL ENERGY USERS' ASSOCIATION ("SIEUA") and AG PROCESSING INC A COOPERATIVE ("AGP") (collectively Missouri Energy Users' Association ("MEUA"), pursuant to 4 C.S.R. 240-2.075 and apply to intervene herein and become parties hereto in respect to the filing by the applicant entity (GMO) on December 22, 2011. In support of this motion, MEUA respectfully shows the following:

1. SIEUA is an unincorporated voluntary association consisting of large commercial and industrial users of natural gas and electricity in the Sedalia, Missouri and in the surrounding area. SIEUA was formed for the purpose of group representation of its members' interests through intervention and other activities in regulatory and other appropriate proceedings.

2. Participating members of SIEUA are as follows:
Pittsburgh Corning Corporation, a manufacturer of cellular glass insulation at its manufacturing facility in Sedalia, Missouri where roughly 160 workers are employed; **Waterloo Industries**, a

manufacturer of tool storage equipment and employer of approximately 650 workers at its manufacturing facility in Sedalia, Missouri; **Hayes-Lemmerz International** employs roughly 800 workers at its Sedalia, Missouri facility where it manufactures automobile wheels; **EnerSys Inc.** employs approximately 500 persons in its industrial battery manufacturing facility in nearby Warrensburg, Missouri; **Alcan Cable Co.** manufactures aluminum electrical conductors and employs 250 persons in its Sedalia, Missouri operation; and **Gardner Denver Corporation** employs 320 workers at its Sedalia works where it makes industrial compressors and blowers. All are electric customers served by the applicant entity.

3. SIEUA's interests in proceedings affecting the rates, terms and conditions of electric service from GMO/Aquila have been previously recognized by the Missouri Public Service Commission in permitting SIEUA's intervention in numerous rate design and electric rate proceedings concerning Aquila and its predecessor UtiliCorp, including without limitation the last series of GMO rate increase cases and, more recently, Case No. ER-2010-0356.

4. AGP is an agricultural cooperative and is a large manufacturer and processor of soybean meal, soy-related food products, and other grain products throughout the central and upper Midwest, including the State of Missouri. AGP is the largest cooperative soybean processing company in the world, the

third-largest supplier of refined vegetable oil in the United States and the third-largest commercial feed manufacturer in North America.

5. AGP operates a major processing facility in St. Joseph, Missouri where it is a major industrial electrical supply customer of the applicant utility in the St. Joseph district.

6. AGP's interest in proceedings affecting the rates, terms and conditions of electric service from the applicant utility has been previously recognized by the Missouri Public Service Commission in permitting AGP's intervention in prior GMO rate design and rate-related matters. AGP has actively participated in such cases.

7. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

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8. On December 22, 2011 a filing was made by GMO as noted above. MEUA participants are vitally interested in this filing and its impact on ratepayers generally and upon their

^{1/} The office address shown is the firm's main office in Kansas City. Mr. Woodsmall is located in the firm's Jefferson City office at 428 East Capitol Avenue, Suite 300, Jefferson City, MO 65101.

operations specifically. As major electric customers of the former MPS/Aquila/GMO, MEUA members are in a position to be directly affected by the proposed increases and may be bound or adversely affected by any Commission order issued in this proceeding. Because the applicant provides electricity to MEUA participants under separate contracts or rate schedules and because of MEUA participants's size and load factors, these companies are in the special and unique position of representing an interest which will not and cannot be represented adequately by any other party and which interest is direct and immediate and differs from that of the general public. Therefore, it will aid the Commission and protect and advance the public interest that SIEUA be permitted to intervene in this proceeding so as to protect its members' interest.

9. For purposes of 4 C.S.R. 240-2.075(2), MEUA states that it opposes discriminatory pricing of electricity and related utility services, opposes increases that are not reasonable and are not related to prudent costs that are incurred by the utility in providing utility service. A more detailed statement of position and identification of issues with respect to the filing may be submitted following a more extensive review of the tariff filing and the materials claimed to support such filing have been made available to representatives of MEUA.

WHEREFORE, MEUA prays (without prejudice to later requests for relief): (a) that MEUA participants be permitted to intervene herein subject to that reservation of right and be made

parties hereto with all rights to have notice of and participate in hearings to present evidence, cross-examine witnesses, file briefs and participate in argument, should any be had; (b) that a full procedural schedule be adopted providing for the filing of exhibits and testimony; (c) that following such investigation the matter be heard by the Commission and that purported applicant utility is put to its proof regarding the need for the proposed increase and all aspects of its proposed methodology of recovery; and (d) for all other needful and proper relief appropriate in the premises.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



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ATTORNEYS FOR MIDWEST ENERGY USERS'
ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Application for Leave to Intervene by U.S. mail, postage prepaid or by electronic mail addressed to all parties by their attorneys of record as made available by the Secretary of the Commission through its EFIS.



Stuart W. Conrad

January 13, 2012