

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

In the Matter of the Compliance of KCP&L)
Greater Missouri Operations Company with) **Case No. EO-2019-0045**
Certain Requirements Related to SB 564)
and Related Matters)

In the Matter of the Compliance of Kansas City)
Power & Light Company with Certain) **Case No. EO-2019-0047**
Requirements Related to SB 564)
and Related Matters)

**APPLICATION TO INTERVENE OF
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

COMES NOW the Missouri Industrial Energy Consumers (“MIEC”), and pursuant to 4 CSR 240-2.075, applies to intervene in Case Nos. EO-2019-0045 and EO-2019-0047. In support of its application to intervene, MIEC states the following.

1. The MIEC is a Missouri nonprofit corporation that represents the interests of industrial customers in matters involving utility issues. Those interests include the interests of large industrial customers of KCP&L Greater Missouri Operations ("GMO") and Kansas City Power & Light Company ("KCP&L").

2. As a representative of the interests of large industrial customers of GMO and KCP&L, the MIEC’s interest is different than that of the general public and may be adversely affected by actions taken as a result of filings and decisions in these cases.

3. The MIEC does not yet have a position on the issues in these cases and reserves the right to take positions on specific issues as these cases proceed.

4. The MIEC’s intervention will serve the public interest by assisting the Commission’s record for decision in these cases.

5. No party will be prejudiced by MIEC's intervention.

6. On February 28, 2019, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company filed their five year capital investment plans as required by Section 393.1400.4 RSMo. Much of the information in the plans was filed as Highly Confidential under Commission Rule 4 CSR 240-2.135(2). Section 393.1400.4 has certain minimum and maximum investments levels in particular categories. It also has an implicit requirement that the "replacing, modernizing, and securing [of] infrastructure" goals of the plan be accomplished in a manner consistent with the public interest. In order to be able to adequately evaluate the five year capital investment plan, the MIEC needs to be made a party to these cases so that it can have access to the information GMO and KCP&L have designated as Highly Confidential.

7. The Commission granted the MIEC intervention in a similar case filed by Union Electric Company d/b/a Ameren Missouri (Case No. EO-2019-0044) in a February 26 order, and the MIEC submits that a similar action is appropriate here.

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

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been
emailed this 3rd day of April, 2019, to all parties on the Commission's service list in this case.

/s/ Lewis Mills