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

In the Matter of the Application of Kansas City	)	
Power & Light Company and KCP&L Greater	)	
Missouri Operations Company for the Issuance	)	Case No. EU-2014-0077
Of an Accounting Authority Order relating to their	)	
Electrical Operations and for a Contingent Waiver	)	
Of the Notice Requirement of 4 CSR 240-4.020(2)	)	

## APPLICATION TO INTERVENE OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

Come now Bayer CropScience, Boehringer Ingelheim, Corn Products, and Ford Motor Company (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 September 24, 2013, *Order Directing Notice, Establishing a Deadline for Filing Requests to Intervene and Setting a Pre-Hearing Conference* file their application to intervene. For its application, the MIEC state as follows:

- 1. The MIEC is a Missouri corporation, and the members of the MIEC are large industrial customers of Kansas City Power and Light Company (KCPL) or KCP&L Greater Missouri Operations (GMO)
- 2. As large industrial customers of KCPL and GMO, the MIEC's interest is different than that of the general public and may be adversely affected by a final order arising from these cases.
- 3. The MIEC and its members oppose the relief sought by KCPL and GMO in these cases, and reserve 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.

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

Respectfully submitted,

BRYAN CAVE, LLP

By:\_\_/s/ Diana Vuylsteke\_\_

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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  $2^{nd}$  day of October, 2013, to all parties on the Commission's service list in this case.

\_\_\_/s/ Diana V uylsteke