

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

In the Matter of the Application of KCPL Greater Missouri Operations Company for Approval to Make Certain Changes in its Charges for Electric Service.)
Case No. ER-2010-0356

APPLICATION TO INTERVENE BY 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 this general rate case, initiated by KCPL Greater Missouri Operations (“KCPL GMO” or “Company”) when it filed new proposed tariff sheets on June 4, 2010, requesting additional electric rate increases of approximately \$ 75.8 million annually for its MPS Division area and approximately \$22.1 million for its L&P Division area (14.43% and 13.87%, respectively).

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. Its website can be accessed at www.moconsumers.org. Consumers Council is an affiliate member of the Consumer Federation of America (CFA) and is also an associate member of the National Association of State Utility Consumer Advocates (NASUCA). Consumers Council has members who are electric customers residing within KCPL GMO’s service territory.

Correspondence, communications, orders and the decision in this matter should be addressed to:

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2. On July 11, 2010, this Commission issued an Order directing interested parties wishing to intervene to do so by July 1, 2010, and thus, this application is timely.

3. Consumers Council has been an active party to several previous Commission cases, as was its successor organization, the Utility Consumers Council of Missouri (UCCM). Consumers Council's interest in this matter relates to the proposed rates, terms and conditions of service for its members who are KCPL GMO residential electric customers and who could be adversely impacted by increased electric rates as a result of the Commission's actions in this rate case. This interest is different than the general public interest.

4. Consumers Council is opposed to any unjust and unreasonable revenue requirement or discriminatory rate design for KCPL GMO residential electric customers. After further investigation, Consumers Council may provide the Commission with a more detailed position on the testimony and proposals that are submitted in this case. Consumers Council is not taking a position on the recommended test year or true-up

dates at this time, but reserves the right to take such positions by the July 20, 2010 deadline set for the parties to submit a procedural schedule in this case.

5. Moreover, Consumers Council believes that its intervention and participation in this proceeding would serve the public interest because of its expertise in utility regulation and its interest in making a constructive contribution to the record, and thus desires to become a party to this case for all purposes.

WHEREFORE, the Consumers Council of Missouri 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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Dated: June 30, 2010

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 30th day of June 2009:

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