

**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 AARP

COMES NOW AARP, 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, AARP states as follows:

1. AARP¹ is a nonprofit corporation that advocates for people who are 50 years of age and older, seeking to promote their independence, choice and control in ways that are beneficial and affordable to them and to society as a whole. AARP operates staffed offices in all 50 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. There are approximately 755,000 AARP members currently residing in the state of Missouri.

¹In 1999, the “American Association of Retired Persons” changed its name to simply “AARP”, in recognition of the fact that people do not have to be retired to become members. AARP is a non-profit corporation that has been granted tax exempt status under Section 501(c)(4) of the Internal Revenue Code as a social welfare membership organization.

AARP promotes the well-being of older persons through advocacy, education, and service on a number of priority issues. AARP has determined that advocacy for reasonable utility rates and service for seniors is one of its priority issues.

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. AARP's interest in this matter relates to the proposed rates, terms and conditions of service for KCPL GMO's residential electric customers. More specifically, AARP's interest in this matter relates to how these proposals may directly and adversely impact KCPL GMO electric customers who are 50 years of age or older. This interest is different than the general public interest. Such customers are particularly vulnerable to increases in energy prices, and on average, they also devote a higher percentage of their total spending on residential energy costs, than do other

age groups. Many seniors also have special needs and safety concerns with regard to their access to electric service.

4. AARP has a history of participation before this Commission and before public utility commissions throughout the country, helping to provide a competent and substantial factual record in numerous cases. AARP testimony and advocacy has assisted commissioners in crafting just and reasonable decisions on several issues regarding rates and services for older utility consumers. Accordingly, AARP 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.

5. AARP is generally opposed to an unjust and unreasonable revenue requirement or any discriminatory rate design for AmerenUE's residential customers. After further investigation, AARP may provide the Commission with a more detailed position on the testimony and proposals that are submitted in this case. AARP 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.

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 2010:

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