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

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In the Matter of KCP&L Greater Missouri Operations Company's Filing for Approval of Demand-Side Programs and for Authority to Establish a Demand-Side Programs Investment Mechanism

Case No EO-2015-0241

## APPLICATION TO INTERVENE OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

Comes now the Missouri Industrial Energy Consumers ("MIEC") and, pursuant to 4 C.S.R. 240-2.075, and the Commission's August 31, 2015 Order Directing Notice of Application, Establishing Intervention Filing Date, and Scheduling a Procedural Conference, files its application to intervene. For its application, the MIEC states as follows:

1. The MIEC is a Missouri corporation, and some of the members of the MIEC are large industrial customers of KCP&L Greater Missouri Operations Company ("GMO").

2. As MIEC's members include large industrial customers of KCPL, the MIEC's interest is different than that of the general public and may be adversely affected by a final order arising from this case.

3. The MIEC does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as the case proceeds.

4. The MIEC's intervention will serve the public interest by assisting the Commission's record for decision in this case.

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

Respectfully submitted,

## BRYAN CAVE, LLP

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

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Attorneys for the Missouri Industrial Energy Consumers

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 3<sup>rd</sup> day of September, 2015, to all parties on the Commission's service list in this case.

/s/ Diana Vuylsteke