

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

In the Matter of Kansas City Power & Light)	Case No. ER-2014-0370
Company's Request for Authority to Implement a)	YE-2015-0194
General Rate Increase for Electric Service.)	YE-2015-0195

**RESPONSE OF THE CONSUMERS COUNCIL OF MISSOURI TO
KCPL'S OPPOSITION TO INTERVENTION**

COMES NOW the Consumers Council of Missouri ("Consumers Council" or "CCM"), and states as follows:

On November 8, 2014, Consumers Counsel filed its timely application to intervene in this rate case.

On November 17, 2014, Kansas City Power & Light Company ("KCPL") filed a "Response In Opposition To Application To Intervene", claiming that the Consumers Council has not made a sufficient filing for intervention.

KCPL argues that Consumers Council has not stated an interest in this case that is different than the general public interest, despite the clear statement of interest contained in Paragraph 3 of Consumers Council's Application to Intervene: "Consumers Council's interest in this matter relates to the proposed rates, terms and conditions of service for KCPL's **residential electric customers**. This interest is different than the general public interest." [Emphasis added].

The Office of the Public Counsel represents the general public interest, which includes customer classes other than the residential customer class. Just as other

potential intervenors which propose to represent customer classes that are a subset of all KCPL's customers, Consumers Council has an interest in representing the residential class of customers only.¹ It should have been obvious to KCPL that the rate design ordered by the Commission in this rate case may adversely affect residential customers vis-à-vis non-residential customer classes or other segments of the general public.

In the alternative to granting Consumer Council's intervention based on its interest which may be adversely affected in this case, subsection 4 CSR 240-2.075(3)(B) of the intervention rule also allows the Commission to grant an intervention if it will serve the public interest to do so. Consumers Council's professional and respectful intervention activity in PSC rate cases stretches back to its incorporation in 1971 when it was known as the "Utility Consumers Council of Missouri" or "UCCM". Its intervention in numerous past rate cases has served the public interest by providing by providing testimony, recommendations, and legal analysis that has aided the Commission in its regulatory responsibility to protect the public.

It has served the public interest for the Consumers Council to be granted intervention in past KCPL rate cases², and it will serve the public interest to allow its intervention in this latest KCPL rate case.

¹ To the extent that the level of residential customer charges become an issue in this rate case, Consumers Council intends to advocate for lower fixed charges for residential customers. With regard to this rate design issue, Consumers Council's interest may possibly focus upon a subset of residential customers (low usage customers) other than the entire class of residential customers. However, Consumers Council reserves the right to address any revenue requirement and rate design issues raised by other parties during the course of this proceeding.

² Most recently, Consumers Council was granted intervention in KCPL Case No. ER-2010-355 and KCPL Case No. ER-2012-0174.

Finally, KCPL questions whether Consumers Council is an association. It is not. The Consumers Council of Missouri is a 501(c)(3) nonprofit corporation, registered with the Missouri Secretary of State.

WHEREFORE, Consumers Council respectfully renews its request to have its Application to Intervene granted, entitling it to fully participate in this proceeding.

Respectfully submitted,

/s/ John B. Coffman

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Dated: November 20, 2014

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 20th day of November, 2014.

/s/ John B. Coffman
