BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of Kansas City Power & Light)	
Company's Request for Authority to Imple-)	
ment a General Rate Increase for Electric Ser-)	ER-2012-0174
vice)	
)	

APPLICATION TO INTERVENE BY MIDWEST ENERGY USERS' ASSOCIATION

COMES NOW the MIDWEST ENERGY USERS' ASSOCIATION ("MEUA") pursuant to 4 C.S.R. 240-2.075 and applies to intervene herein and become a party for all purposes in respect to the rate increase filing by Kansas City Power & Light Company ("KCPL") on February 27, 2012. In support, MEUA states:

1. MEUA is an unincorporated ad-hoc association of large commercial and industrial users of electricity who group together using the MEUA vehicle to combine resources and gain economies in representation and activity in these rate cases. For purposes of this case, the initial MEUA participants are DST Realty, Inc., Broadway Square Partners, LLC and Boulevard Brewing Company. Each is a KCPL customer and has previously intervened (individually or through MEUA) and been active in earlier KCPL proceedings. Additional participants may be added at a later date since we have not been able to have their engagements confirmed due to insufficient time to get all necessary corporate approvals before the intervention deadline.

2. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

Jeremiah D. Finnegan, Esq. FINNEGAN, CONRAD & PETERSON, L.C. 1209 Penntower Office Center 3100 Broadway Kansas City, Missouri 64111 Voice: (816) 753-1122

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- 3. On February 27, 2012 KCPL filed this case to gain Commission approval of a general rate increase.
- 4. MEUA participants are interested in and will in the future be affected by the relief sought by KCPL. As larger industrial or commercial customers, their interest is direct, immediate, unique, different from that of the general public, and will not or cannot adequately be represented by any other party. Therefore, it will aid the Commission and protect and advance the public interest that MEUA be permitted to intervene in this proceeding to protect its participants' interest which no other party is in a position properly to protect.
- 5. For purposes of 4 C.S.R. 240-2.075(2), MEUA states that it opposes the discriminatory and non-cost-based pricing of electricity and related utility services. KCPL's application has not been shown to be just, reasonable, or non-discriminatory. However, analysis of KCPL's application has just begun and MEUA is unable to be more specific pending that review and analysis of materials that are designated as highly confidential and have not been disclosed to MEUA representatives.

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WHEREFORE, MEUA requests: (a) that it be permitted to intervene herein and be made parties hereto with all rights to have notice of and participate in hearings to present evidence, cross-examine witnesses, file briefs and participate in argument, should any be had; and (b) for all other needful and proper relief appropriate in the premises.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

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ATTORNEYS FOR MIDWEST ENERGY USERS' ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by electronic means, by United States Mail, First Class postage prepaid, or by hand delivery to all known parties in interest upon their respective representatives or attorneys of record as reflected in the records maintained by the Secretary of the Commission on the EFIS.

Jeremiah D. Finnegan

Dated: March 19, 2012