

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

<b>In the Matter of the Application of</b>	)	
<b>KCP&amp;L Greater Missouri Operations</b>	)	
<b>Company for Approval to Make for</b>	)	<b><u>File No. ER-2010-0356</u></b>
<b>Approval to Make Certain Changes in</b>	)	<b>Tariff No. JE-2010-0693</b>
<b>its Charges for Electric Service</b>	)	

**MOTION FOR EXPEDITED CONSIDERATION  
OF APPLICATION TO INTERVENE OF  
AG PROCESSING INC A COOPERATIVE**

---

COMES NOW AG PROCESSING INC A COOPERATIVE ("AGP") and, reserving its rights in pending appeals and without prejudice to any and all rights to challenge the authority of the filing entity to submit the tariffs that purportedly initiated this case, moves that its Application to Intervene be given expedited consideration by the Commission following a shortened response time, if any be needed, and in support thereof shows:

1. On this date an Application to Intervene was submitted by AGP listing its participating members, all of whom are customers of the applicant.

2. This motion seeks an early determination by the Commission of the intervention application filed this date by AGP so that representatives of this entity may have access to the Highly Confidential materials filed by the applicant that the applicant has thus far refused to provide.

3. Under a technical reading of the Commission's applicable rule, that rule does not apply to non-parties. However, AGP has been an intervenor in numerous other prior cases

going back many years, certainly longer than the applicant entity has existed.

4. Moreover, undersigned counsel spoke to applicant's representative Mr. Blanc on Monday, June 7, at the MARC meeting in Kansas City and was assured by him that a full electronic copy would be provided to him forthwith and that the materials provided not be "locked down" using e-mail technology so as to prevent forwarding to co-counsel. Not only has no Highly Confidential information yet been provided, not even the public information has been provided to undersigned counsel by the applicant, despite AGP's active involvement in the prior rate case for this applicant.

5. Further, applicant is well aware of AGP's interest and involvement in such rates, having recently received a visit from applicant's representative Mr. Downey at AGP's offices to discuss the proposed rate increase.

6. Usual Commission practice might allow this application to lay before the Commission until after July 1, 2010. Given the size and apparent importance of this case, representatives of AGP need access to the full filing as soon as possible, hence this motion for expedited treatment of the accompanying application to intervene. Deferring AGP's application until after July 1 will only further delay access to and analysis of the full filing.

7. As a long-standing active intervenor in such cases, AGP would request that the same expedient treatment be given to this request as though it were coming from a utility instead of a customer.

WHEREFORE this Motion should be granted and accelerated consideration and a shortened response time, if any be needed, be granted directed.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

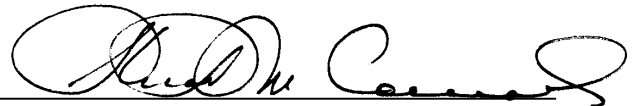


Stuart W. Conrad MBE #23966  
David L. Woodsmall MBE #40747  
3100 Broadway, Suite 1209  
Kansas City, Missouri 64111  
(816) 753-1122  
Facsimile (816)756-0373  
Internet: stucon@fcplaw.com

ATTORNEYS FOR AG PROCESSING INC A  
COOPERATIVE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by U.S. mail, postage prepaid or by electronic mail addressed to all parties by their attorneys of record as made available by the Secretary of the Commission through its EFIS.



Stuart W. Conrad

June 16, 2010