

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

AG PROCESSING INC A COOPERATIVE,)	
Complainant,)	
)	
vs.)	HC-2010-0235
)	
KCP&L GREATER MISSOURI OPERATIONS)	
COMPANY,)	
Respondent.)	

Ag Processing, Inc.,)	
)	
)	
Complainant,)	
)	
v.)	HC-2012-0259
)	
KCP&L Greater Missouri Operations)	
Company,)	
)	
Respondent.)	

AG PROCESSING INC A COOPERATIVE
MOTION FOR STAY OF COMMISSION ORDER^{1/}

COMES NOW AG PROCESSING INC A COOPERATIVE ("AGP") and moves that the Commission Order of February 27, 2013 in the above file be stayed pending appeal and in support there of states:

1. AGP incorporates as though fully and completely set forth each of the grounds stated in its Application for Rehearing filed contemporaneously herewith in the above files.

^{1/} AGP is captioning this Motion in both files even though the pertinent portions of the requested relief pertain to file No. HC-2012-0235, but we do so without prejudice to our position that the consolidation that was ordered exceeds the mandate that was issued by the reviewing court, is not justified by either the evidence or law and is, therefore, unlawful in itself.

2. Funds have already been returned to steam customers pursuant to a prior Commission order as to which the utility neither sought nor obtained a stay from this Commission nor sought nor obtained a stay from the reviewing court. Accordingly those funds have now been finally distributed to the steam customers and this Commission is without power to order that the utility charge these customers again pursuant to the terms of the QCA Stipulation or under the approved tariff.

3. Pending determination of the authority of the Commission to enter such an order, the above Order should be stayed.

WHEREFORE for the foregoing reasons, a stay should be granted.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

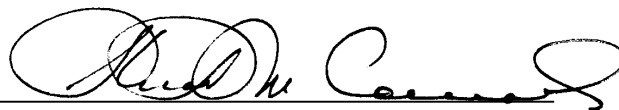


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ATTORNEYS FOR AG PROCESSING INC.

SERVICE CERTIFICATE

I certify that I have served a copy of the foregoing pleading upon identified representatives of the parties hereto per the EFIS listing maintained by the Secretary of the Commission by electronic means as an attachment to e-mail, all on the date shown below.



Stuart W. Conrad, an attorney for
Ag Processing Inc a Cooperative

March 4, 2013