BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| In the Matter of the Verified Joint Application of |) | |
|--|---|-----------------------|
| Kansas City Power & Light Company and |) | |
| KCP&L Greater Missouri Operations Company |) | Case No. EE-2018-0108 |
| For a Variance from the Commission's Affiliate |) | |
| Transactions Rule 4 CSR 240-20.015 |) | |

APPLICATION FOR INTERVENTION OF MIDWEST ENERGY CONSUMER'S GROUP

COMES NOW the Midwest Energy Consumer's Group, pursuant to 4 CSR 240-2.075 and the Commission's June 18, 2018 *Order Providing Notice, Establishing Intervention Deadline, and Scheduling Procedural Conference*, and for its Application for Intervention in this case, states as follows:

- 1. Midwest Energy Consumer's Group ("MECG") is an incorporated association representing the interests of large commercial and industrial users of electricity.
- 2. On May 18, 2018, Kansas City Power & Light Company ("KCPL") and KCP&L Greater Missouri Operations Commission ("GMO") filed a Joint Application requesting a variance from the Commission's asymmetric pricing requirements of the Commission's affiliate transactions rule as it applies to transactions between KCPL / GMO and their affiliate Grid Assurance.
- 3. As a group of large commercial and industrial customers of KCPL and GMO, MECG's interests may be affected by the decisions reached in this case. Furthermore, as a representative of large commercial and industrial customers, MECG's interest in this case is different than that of the general public.

4. MECG is unable to state its position relating to the relief sought by KCPL and GMO. MECG is continuing to review KCPL / GMO's filing and reserves the right to take positions on specific issues as this case proceeds.

5. MECG's intervention will serve the public interest by assisting the record for the Commission's decision in this case.

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

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WHEREFORE, MECG respectfully requests that the Commission issue its order granting its Application for Intervention and that it be made a party hereto with all rights to participate in this matter.

Respectfully submitted,

David L. Woodsmall, MBE #40747

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ATTORNEY FOR THE MIDWEST ENERGY CONSUMERS' GROUP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

David L. Woodsmall

Dated: June 28, 2018