

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

In the Matter of Great Plains Energy, Inc.'s)
Acquisition of Westar Energy, Inc., and)
Related Matters.)

Case No. EM-2016-0324

**APPLICATION FOR INTERVENTION OF
MIDWEST ENERGY CONSUMER'S GROUP
AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW the Midwest Energy Consumers' Group, and for its Application for Intervention in this case, states as follows:

1. Midwest Energy Consumer's Group ("MECG") is an unincorporated association consisting of large commercial and industrial users of electricity. For purposes of this case, members of MECG include Wal-Mart Stores, Inc.; Praxair, Inc.; Show-Me Ethanol, LLC.; North Kansas City Hospital; Little Blue Valley Sewer District; Cargill, Incorporated; DST Realty, Inc.; Broadway Square Partners, LLP; and Ameristar Casino Kansas City, Inc.

2. On March 31, 2016, Great Plains Energy ("GPE") announced that it was acquiring Westar Energy. On June 8, 2016, the Commission authorized Staff to conduct an investigation regarding the Commission's jurisdiction over the acquisition, especially in light of GPE's previous commitments in the Commission's docket approving the creation of a holding company structure.

3. MECG shares Staff's concerns regarding the potential for the acquisition of Westar to create a detriment to Missouri customers. Staff astutely directed the Commission's attention to the financial repercussions to Missouri ratepayers when Aquila took on excessive debt in order to finance its acquisition of other utilities. Given the amount of debt to be assumed by GPE in this case, the Commission should satisfy

itself that Missouri ratepayers will be protected from any detriment associated with this acquisition.

4. MECG's intervention will serve the public interest by assisting the record for the Commission's decision in this case. Specifically, MECG may be able to provide additional legal analysis regarding the Commission's jurisdiction as well as raising other concerns that may impact Missouri ratepayers. For this reason, MECG's intervention is in the public interest.

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

David L. Woodsmall, Esq.
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6. Pursuant to 4 CSR 240-2.080(14), MECG seeks expedited treatment for this pleading. Such treatment is warranted by the expedited process contemplated by the Commission's June 8, 2016 order granting Staff's motion to open an investigation. That order contemplates a report by July 25, 2016 (after 45 days). Given the expedited nature of this proceeding, it is unworkable to waste 25% of the schedule waiting on any response to this application for intervention. Instead, given the simplicity of this request, MECG asks that the Commission order a response to this application by the end of the day on June 10, 2016 with a Commission order granting intervention as soon as practical thereafter.

7. Consistent with 4 CSR 240-2.080(14), MECG filed this pleading as soon as possible. The Commission's order granting this investigation was issued on the afternoon of June 8, 2016. Counsel immediately commenced to seeking client authorization to participate in this proceeding. Once received, counsel immediately filed this pleading. As such, this pleading was filed in less than 24 hours.

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,

A handwritten signature in black ink, appearing to read "David L. Woodsmall". The signature is fluid and cursive, with the first name "David" being more prominent.

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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.

A handwritten signature in black ink, appearing to read "David L. Woodsmall", written in a cursive style.

David L. Woodsmall

Dated: June 9, 2016