

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

EARTH ISLAND INSTITUTE d/b/a/     )  
RENEW MISSOURI, et. al.,         )  
  )  
                          COMPLAINANTS,     )  
  )  
                          v.                     )  
  )  
KANSAS CITY POWER & LIGHT     )  
COMPANY,                                 )  
  )  
                          RESPONDENT.     )

Case No. EC-2013-0379

**APPLICATION TO INTERVENE OUT OF TIME OF  
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Comes now the Missouri Industrial Energy Consumers or “MIEC” and, pursuant to 4 C.S.R. 240-2.075, files its Application to Intervene. In support of its Application, the MIEC states as follows:

1. The MIEC is a Missouri not for profit corporation, and the members of the MIEC are large industrial customers.

2. As large industrial customers, the interests of the MIEC and each of its members are different than that of the general public and may be adversely affected by a final order arising from this case. This complaint addresses compliance with the Missouri renewable energy standard (“RES”). The MIEC has been active in all matters involving the RES, including rulemaking and litigation. In addition to possibly directly affecting the financial interests of MIEC members served by the subject utility, the resolution of this matter may create precedent that indirectly impacts the interests of those and other members of the MIEC.

3. The MIEC and its members are reviewing the complaint and answer in this case and reserve the right to take positions on specific issues as this case proceeds.

4. Intervention by the MIEC and its members will serve the public interest by assisting the Commission's record for decision in this case.

5. The MIEC accepts the record, and all orders and requirements issued by the Commission in this case. Good cause exists for allowing intervention 11 days after the intervention date because no party will be harmed by such late intervention as the Commission has not yet even held a scheduling conference.

WHEREFORE, the MIEC requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully submitted,

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Attorneys for The Missouri Industrial  
Energy Consumers

#### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 14th day of March, 2013, to all parties on the Commission's service list in this case.

/s/ Edward F. Downey