

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

In the Matter of the Joint Application of Great Plains)	
Energy Incorporated, Kansas City Power & Light)	Case No. EE-2017-0113
Company and KCP&L Greater Missouri Operations)	
Company for a variance from 4 CSR 240-20.015.)	

**OBJECTION TO STIPULATION AND REQUEST FOR HEARING
OF MIDWEST ENERGY CONSUMERS GROUP**

COMES NOW the Midwest Energy Consumer's Group, pursuant to 4 CSR 240-2.115(2) and the Commission's October 14, 2016 *Order Directing Notice and Setting Intervention Deadline*, and for its Objection to Stipulation, states as follows:

1. Concurrent with the filing of the Application in this docket, Staff and Great Plains filed a Stipulation and Agreement designed to address detriments associated with Great Plains' acquisition of Westar Energy. As detailed in MECG's Application to Intervene, the Stipulation was negotiated in behind closed doors by representatives of Staff and Great Plains and did not include many of the parties (i.e., customers, unions, environmental groups, etc.) that are typically involved in the Commission's consideration of a merger docket.

2. In its October 14, 2016 *Order Directing Notice and Setting Intervention Deadline*, the Commission ordered intervenors to file any objection to the Stipulation by October 26, 2016. Through this pleading, MECG informs the Commission of its objection to the Stipulation and Agreement. Moreover, consistent with the Commission's treatment of other merger review dockets (see Algonquin acquisition of Empire District Electric, Case No. EM-2016-0213; Great Plains acquisition of Aquila, Inc., Case No. EM-2007-0374), MECG requests that the Commission set this matter for hearing and provide other parties the procedural due process rights provided by Chapter 536.

WHEREFORE, MECG respectfully objects to the Stipulation and Agreement in this case and respectfully requests that the Commission schedule a hearing in this matter.

Respectfully submitted,



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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: October 18, 2016