

# STEWART & KEEVIL, L.L.C.

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July 29, 2003

**FILED<sup>2</sup>**

JUL 29 2003

Missouri Public  
Service Commission

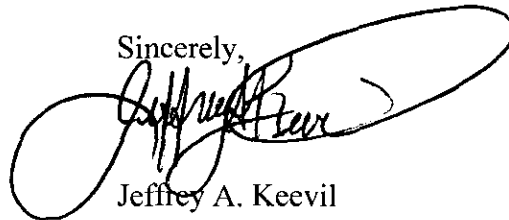
Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

RE: Case No. HE-2003-0412

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are an original and the appropriate number of copies of a MOTION FOR LEAVE TO WITHDRAW AS COUNSEL on behalf of Jeffrey A. Keevil of the law firm Stewart & Keevil, L.L.C. Copies of the enclosed have been sent to counsel of record in this proceeding.

Sincerely,



Jeffrey A. Keevil

JAK/er

Enclosures

Cc: General Counsel's Office  
Office of the Public Counsel  
Paul DeFord  
Brian Kirk

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

ORIGINAL  
FILED  
JUL 29 2003

In the matter of the 2002 )  
Annual Report of )  
Trigen-Kansas City Energy )  
Corporation )

Case No. HE-2003-0412

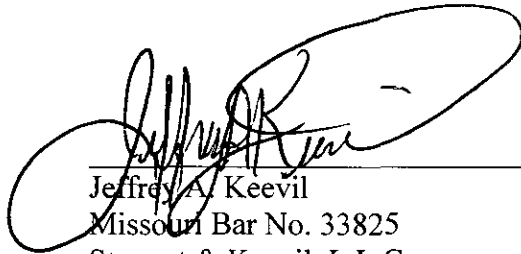
Missouri Public  
Service Commission

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL**

COMES NOW Jeffrey A. Keevil of the law firm Stewart & Keevil, L.L.C. and pursuant to 4 CSR 240-2.040(6) moves for leave to withdraw as counsel of record for Trigen-Kansas City Energy Corporation ("Trigen") in this case. As the Commission is aware and as the record of this case reflects, on July 15, 2003, Paul S. DeFord of the law firm Lathrop & Gage L.C. filed a motion in this case on behalf of Trigen; however, the undersigned received Staff's recommendation concerning the motion filed by Mr. DeFord and is unable to tell from the recommendation whether such recommendation was also served on Mr. DeFord. Therefore, in order to correct the service list and ensure that service of pleadings herein are sent to Mr. DeFord rather than the undersigned, the undersigned should be removed from the service list and Mr. DeFord should be listed as counsel for Trigen. Since Trigen has retained new counsel for this case Trigen will not be prejudiced by the withdrawal of the undersigned counsel or the undersigned law firm, and no other parties will be prejudiced by such withdrawal; accordingly, this motion for leave to withdraw should be granted.

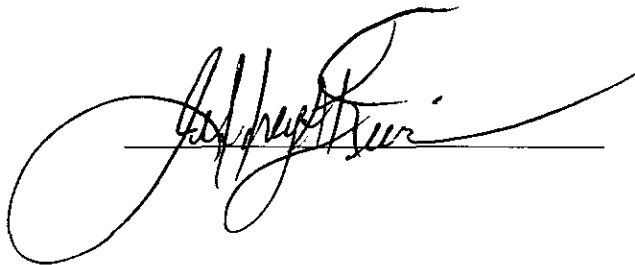
WHEREFORE, the undersigned requests the Commission grant him leave to  
withdraw from this case.

Respectfully submitted,

  
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Jeffrey A. Keevil  
Missouri Bar No. 33825  
Stewart & Keevil, L.L.C.  
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Columbia, Missouri 65201  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served by placing same in first-class mail, postage paid, or by hand-delivery, to the Missouri Public Service Commission's General Counsel's Office; the Office of the Public Counsel; Paul S. DeFord, Lathrop & Gage L.C., 2345 Grand Blvd., Suite 2800, Kansas City, Missouri 64108-2684; and Trigen-Kansas City Energy Corporation, 115 Grand Blvd., Kansas City, Missouri 64106 on this 29th day of July, 2003.

  
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