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JOHN A. RUTH
D. GREGORY STONEBARGER

June 15, 2000

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Case No. EM-2000-753

Dear Judge Roberts:

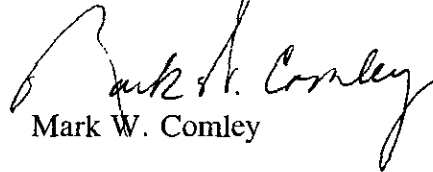
Enclosed for filing in the above referenced matter, please find the original and eight copies of an Application to Intervene.

Please contact me if you have any questions regarding this filing. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:


Mark W. Comley

MWC/slw

Enclosures

cc: Office of Public Counsel
PSC General Counsel
Timothy M. Rush
James M. Fischer
William G. Riggins

FILED²

JUN 15 2000

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

JUN 15 2000

Missouri Public
Service Commission

In the Matter of the Application of)
Kansas City Power & Light Company for)
an Order Authorizing the Transfer of)
Certain Electrical Generation Assets Used)
to Provide Electric Service to Customers)
in Missouri and Other Relief Associated)
with Kansas City Power & Light Company's)
Plan To Restructure Itself into a Holding)
Company, Competitive Generation Company,)
Regulated Utility Company and Unregulated)
Subsidiary)

Case No. EM-2000-753

APPLICATION TO INTERVENE

Comes now St. Joseph Light & Power Company (SJLP) and for its application to intervene states the following to the Commission:

1. SJLP is a corporation organized and existing under the laws of the State of Missouri¹ and duly authorized to transact and conduct the business of an electric utility under the laws of and in the State of Missouri with its office and principal place of business located at 520 Francis Street, St. Joseph, Missouri.

2. This case arose when Kansas City Power & Light Company (KCPL) filed an application with the Commission requesting that the Commission authorize KCPL to restructure itself to create a holding company, a competitive generation company, a regulated utility company and an unregulated subsidiary. On May 16, 2000, the Commission issued an order and notice

¹The provisions of 4 CSR 240-2.060(1)(B) require that the applicant, as a corporation, include a certificate of good standing from the secretary of state with this application. SJLP moves for a waiver of this requirement. SJLP is well known to this Commission, and most recently its corporate authority and capacity has been more than adequately demonstrated in Case No. EM-2000-292 which involves the proposed merger of the company with Utilicorp United Inc.

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directing that interested parties wishing to intervene must do so on or before June 15, 2000. This application is therefore timely.

3. Copies of orders, pleadings and correspondence in this matter should be sent to the following:

Timothy M. Rush
St. Joseph Light & Power Company
P.O. Box 998
St. Joseph, MO 64502
Telephone No.: 816/387-6253
Fax No.: 816/387-6453

Mark W. Comley
Robert K. Angstead
Newman, Comley & Ruth P.C.
P.O. Box 537
Jefferson City, MO 65102-0537
Telephone No.: 573/634-2266
Fax No.: 573/636-3306

4. SJLP, Empire District Electric Company (Empire) and KCPL are co-owners of the Iatan Power Plant (Iatan) located in Iatan, Missouri. KCPL is presently the managing entity for the plant. Iatan is a 650 megawatt (nominal) coal-fired generating unit and is relied on extensively by SJLP.

5. SJLP has a strong interest in its continuing relationship with KCPL and the future of the plant. The application in this matter contemplates a transfer of KCPL's ownership interest in the plant to another entity, and it is not clear how that transfer will affect SJLP's rights and obligations with respect to the plant.

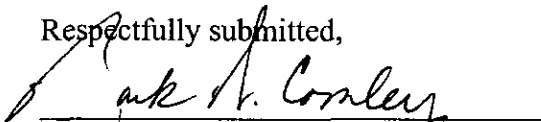
6. At this time, SJLP is uncertain of the position it will take in this matter.

7. Because of its relationship with KCPL respecting operation and ownership of Iatan and also, by virtue of its position as a public utility operating under the laws of the State of Missouri,

and pursuant to certificates of public convenience and necessity issued by the Missouri Public Service Commission, SJLP's interests in this proceeding are different from those of the general public. Moreover, this is a seminal case which is likely to influence the manner in which other electrical utilities will approach restructuring in Missouri. As an electric utility in this state, SJLP's participation in the case will be of assistance to the Commission. SJLP's intervention in this proceeding is in the public interest.

WHEREFORE, SJLP respectfully requests the Commission enter an order granting its Application to Intervene.

Respectfully submitted,



Mark W. Comley #28847

Robert K. Angstead #37795

NEWMAN, COMLEY & RUTH P.C.

601 Monroe Street, Suite 301

P.O. Box 537

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(573) 634-2266

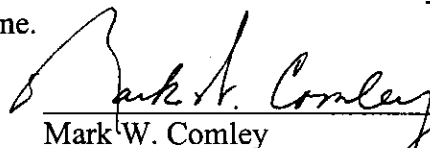
(573) 636-3306 (FAX)

Attorneys for St. Joseph Light & Power Company

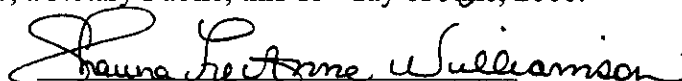
ATTORNEY VERIFICATION

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

I, Mark W. Comley, being first duly sworn, do hereby certify, depose and state that I am the attorney for St. Joseph Light & Power Company which seeks intervention in the above captioned proceeding before the Missouri Public Service Commission; that I have read the above and foregoing Application to Intervene and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing application by the above said applicant to intervene.


Mark W. Comley

Subscribed and sworn to before me, a Notary Public, this 15th day of June, 2000.


Notary Public

My Commission expires:
Shawna LeAnne Williamson
Notary Public - State of Missouri
County of Moniteau
My Commission Expires 08/13/2002



Certificate of Service


I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, on this 15th day of June, 2000, to:

Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

William G. Riggins
General Counsel
KCP&L
1201 Walnut
Kansas City, MO 64106

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Jefferson City, MO 65102

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Jefferson City, MO 65101


Mark W. Comley