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June 13, 2000

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

**RE: Kansas City Power and Light  
Case No. EM-2000-753**

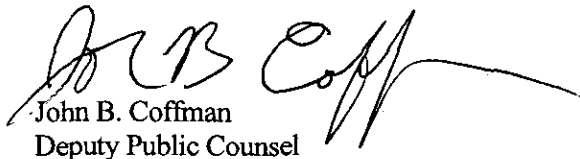
**FILED<sup>2</sup>**  
JUN 13 2000  
Missouri Public  
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case please find the original and eight copies of **Request for Hearing**. I have on this date mailed, faxed, and/or hand-delivered the appropriate number of copies to all counsel of record. Please "file" stamp the extra enclosed copy and return it to this office.

Thank you for your attention to this matter.

Sincerely,

  
John B. Coffman  
Deputy Public Counsel

JBC:jb

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

JUN 13 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 Electric 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

REQUEST FOR HEARING

COMES NOW, the Office of the Public Counsel (Public Counsel) and for its Request for Hearing states as follows:

1. On May 16, 2000, the Public Service Commission (Commission) issued its Order and Notice, stating that if neither the Commission's Staff nor the Public Counsel requested a hearing, then the Commission may determine that a hearing is not necessary in this case.
2. On June 8, 2000, the Commission issued its Order Denying Motion to Reject Application as Deficient, denying Public Counsel's request to have Company's Application rejected as a result of a variety of deficiencies regarding the proper form for applications required by 4 CSR 240-2.606. The Commission further noted that Company is suggesting that this case proceed based upon a "cooperative, collaborative and phased approach," including "a series of workshops and technical conferences."
3. Public Counsel believes that it is appropriate to preserve its procedural rights at this time by requesting that an evidentiary hearing be held in this matter at the end of each "phase" of the procedure as it has been broadly defined.

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 13<sup>th</sup> day of June, 2000:

James C. Swearengen  
Brydon, Swearengen & England  
P.O. Box 456  
Jefferson City, MO 65102

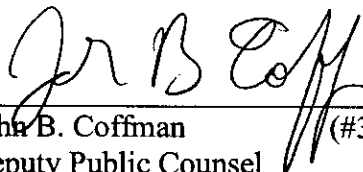
Steven Dottheim  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

A handwritten signature in black ink, appearing to read "S. Dottheim", is written over a horizontal line.

WHEREFORE, Public Counsel respectfully requests that this Commission hold an evidentiary hearing to accept testimony on the issues raised by Company's Application at the conclusion of each "phase" of the procedural process that may be adopted in this case.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By:   
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