



Susan B. Cunningham
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August 28, 1998

FILED
AUG 31 1998
Missouri Public
Service Commission

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

RE: Case No. 00-99-44

Dear Mr. Roberts:

Enclosed for filing with the Commission in the above-referenced matter are the original and 14 copies of Kansas City Power & Light Company's Application to Intervene. A copy of the foregoing Application has been hand-delivered or mailed this date to parties of record.

Please bring this filing to the attention of the Commission.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Susan B. Cunningham".

Susan B. Cunningham

Enclosures

cc: Parties of Record

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2. All communications regarding this proceeding should be sent to:

3. On July 28, 1998, West Elm Place Corporation, The Empire District Electric Company, St. Joseph Light & Power Company, Arkansas Western Gas Company d/b/a

Associated Natural Gas Company, Laclede Gas Company, Missouri-American Water Company and UtiliCorp United Inc. d/b/a/ Missouri Public Service (collectively referred to as "the Companies") filed an Application for Rehearing and Stay pursuant to Section 386.500 RSMo 1994 and 4 CSR 240-2.160, seeking rehearing regarding the Commission's June 29 Supplemental Order No. 52 ("Order 52") in Case No. 11,110. Order 52 is the order in which the Commission has set out its assessments of expenses directly attributable to all groups of public utilities and also the amounts of expenses not directly attributable to any such group. The purpose of Order 52 was to establish the public utility assessments provided for pursuant to Section 386.370 RSMo 1994 for the Commission's fiscal year commencing July 1, 1998 (i.e., the 1999 fiscal year).

4. The Commission issued an Order Regarding Application for Rehearing and Stay issued on August 5, 1998, and, among other things, established an intervention deadline of August 31, 1998.

5. In addition to the Companies, KCPL was assessed regulatory assessments pursuant to Order 52. As a result, decisions in this proceeding potentially may affect the amount of KCPL's regulatory assessment in 1999 and potentially may affect its regulatory assessment in future years. Therefore, KCPL requests the opportunity to intervene and participate in this proceeding in order to monitor the case and to protect its interests.


6. For this reason, KCPL's interest in this proceeding is different from that of the general public and cannot be represented by any other party to these proceedings.

7. KCPL's participation will aid the Commission in resolving the issues raised in this proceeding. Consequently, KCPL's intervention and participation will promote the public interest.

8. There is insufficient information currently available to identify individual issues that may arise in this case that may affect KCPL's interests. Consequently, KCPL reserves its right to take a position and participate with regard to any matter or issue arising in this case that may affect KCPL's interests

WHEREFORE, Kansas City Power & Light Company respectfully requests the Commission to issue an order authorizing it to intervene in the above-captioned matter.

Respectfully submitted,


Susan B. Cunningham, MO #47054

Staff Attorney

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ATTORNEY FOR

KANSAS CITY POWER & LIGHT COMPANY

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a copy of the above and foregoing Application of Kansas City Power & Light Company to Intervene was deposited in the United States Mail, postage prepaid, on the 28th day of August, 1998, and addressed to the following:

James C. Swearengen
Paul A. Boudreau
Brydon, Swearengen & England P.C.
P.O. Box 456
Jefferson City, MO 65102-0456

Michael C. Pendergast
Laclede Gas Company
720 Olive St., Room 1520
St. Louis, MO 63101

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Susan B. Cunningham