



Susan B. Cunningham  
Staff Attorney

(816) 556-2789  
(816) 556-2787 (Telecopy)

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

August 28, 1998

FILED  
AUG 31 1998  
Missouri Public  
Service Commission

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

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED  
AUG 31 1998  
Missouri Public  
Service Commission

In the Matter of the Assessment Against )  
the Public Utilities in the State of Missouri ) Case No. 00-99-44  
for the Expenses of the Commission for the )  
Fiscal Year Commencing July 1, 1998. )

APPLICATION OF KANSAS CITY POWER &  
LIGHT COMPANY TO INTERVENE

COMES NOW Kansas City Power & Light Company ("KCPL"), pursuant to 4 CSR 240-2.075, and applies to intervene in the above-captioned matter and to become a party herein. In support thereof, KCPL states:

1. KCPL is a corporation duly organized and existing under the laws of the State of Missouri, with its principal office at 1201 Walnut Street, Kansas City, Missouri, 64106, and is an electrical corporation and public utility as defined in Section 386.020, RSMo. KCPL primarily is engaged in the generation, transmission, distribution and sale of electric energy and power in the states of Missouri and Kansas.

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

Susan B. Cunningham  
Staff Attorney  
Kansas City Power & Light Company  
P.O. Box 418679  
Kansas City, Missouri 64141-9679  
Telephone: (816) 556-2789  
Telecopy: (816) 556-2787

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.

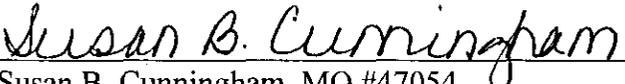
6. For this reason, KCPL’s interest in this proceeding is different from that of the general public and cannot be represented by any other party to these proceedings.

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

Kansas City Power & Light Company

1201 Walnut Street

Kansas City, MO 64106

Telephone: (816) 556-2483

Telecopy: (816) 556-2787

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 28<sup>th</sup> day of August, 1998, and addressed to the following:

James C. Swearngen  
Paul A. Boudreau  
Brydon, Swearngen & 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

SBCunningham  
Susan B. Cunningham