



Susan B. Cunningham
Staff Attorney

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

FILED
MAY 06 1998
MISSOURI
PUBLIC SERVICE COMMISSION

May 5, 1998

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

RE: Case No. EO-98-401

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,

Susan B. Cunningham

Susan B. Cunningham

Enclosures

cc: All Parties of Record
Office of the Public Counsel

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
MAY 06 1998
MISSOURI
PUBLIC SERVICE COMMISSION

In the Matter of the Application of Union)
Electric Company for Authorization to Manage) Case No. EO-98-401
Sulfur Dioxide Emission Allowance Inventory.)

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 386.022, 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 in this proceeding should be addressed to the following:

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

Wm. Edward Blunk
Supervisor - Fuel Planning
Kansas City Power & Light Company
P.O. Box 418679
Kansas City, Missouri 64141-9679
(816) 556-2324

3. In this case, Union Electric Company (UE) requests authority to manage its sulfur dioxide emission allowance inventory. UE states that it forecasts an allowance surplus through the year 2007 and requests authority to manage these allowances by utilizing such trading techniques as allowance forwards, buying and selling allowances, writing allowance options, swapping allowances, loaning allowances and the use of other financial instruments.

4. On May 5, 1995, the Commission issued an Order Approving Stipulation and Agreement in Case No. EO-95-184, in which KCPL requested authority to sell sulfur dioxide emission allowances. UE requested, and was granted, intervention in that case. As a part of the approved settlement, KCPL agreed to provide UE (and the other parties to the proceeding): (1) annual reports detailing the allowance transactions occurring during the previous year, and (2) the quantity and serial numbers of allowances issued to KCPL by the Environmental Protection Agency during the previous year.

5. In order to ensure uniformity and consistency both in the treatment of sulfur dioxide emission allowances and in the treatment of the jurisdictional utilities seeking to manage their emission allowances, KCPL maintains it has an interest in the resolution of this case. In addition, KCPL views the treatment of these emission allowances, generally, as an evolving process. To that end, KCPL desires to participate in this matter as potentially new and different issues, policies and procedures, trends in trading techniques, among other issues, may be addressed, the resolution of which may affect KCPL.

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

7. 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, KCPL prays that the Commission grant its Application to Intervene and allow it to become a party to these proceedings.

Respectfully submitted,

KANSAS CITY POWER & LIGHT COMPANY



Susan B. Cunningham
Staff Attorney, MO #47054
Kansas City Power & Light Company
1201 Walnut Street
Kansas City, MO 64106
(816) 556-2789 (telephone)
(816) 556-2787 (telecopy)

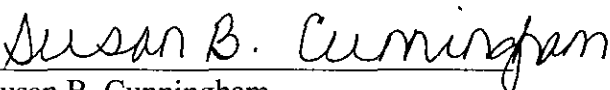
Attorney for
Kansas City Power & Light Company

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 5th day of May, 1998, and addressed to the following:

James J. Cook
Associate General Counsel
Ameren Services Company
P.O. Box 66149
St. Louis, MO 63166

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



Susan B. Cunningham

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

VERIFICATION

Susan B. Cunningham, being duly sworn upon her oath deposes and says that she is an attorney for Kansas City Power & Light Company, that she has read and is familiar with the foregoing Application; and that the statements therein are true to the best of her knowledge, information and belief.

Susan B. Cunningham
SUSAN B. CUNNINGHAM

Subscribed and sworn to before me this 5th day of May, 1998.

Rebecca J. Bradley
NOTARY PUBLIC

My Commission Expires:

7-28-01

