

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED<sup>3</sup>

NOV 05 2001

Missouri Public  
Service Commission

Staff of the Missouri Public )  
Service Commission, )  
 )  
Complainant, )  
 )  
vs. )  
 )  
Union Electric Company, )  
d/b/a AmerenUE, )  
 )  
Respondent. )

Case No. EC-2002-1

**APPLICATION OF  
KANSAS CITY POWER & LIGHT COMPANY  
TO INTERVENE**

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

1. KCPL is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 1201 Walnut, Kansas City, Missouri 64106. KCPL is engaged in the generation, transmission, distribution, and sale of electric energy and power in those areas in Missouri certificated to it by the Missouri Public Service Commission (hereinafter "Commission"), including the City of Kansas City, Missouri, as well as in areas of eastern Kansas. KCPL is an "electrical corporation" and "public utility" as those terms are defined in Section 386.020, RSMo 2000<sup>1</sup>, and, as such, is subject to the jurisdiction of the Commission as provided by law. KCPL provides electric service to approximately 230,000 residential customers

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<sup>1</sup>All statutory references are to Revised Statutes of Missouri 2000.

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and approximately 30,100 commercial and industrial customers in Missouri. KCPL's Certificate of Good Standing was filed with the Commission in Case No. EM-2000-464 and is incorporated herein by reference.

2. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Tim Rush  
Kansas City Power & Light Company  
1201 Walnut  
Kansas City, MO 64141  
Telephone: (816) 556-2344  
Fax: (816) 556-2924

James M. Fischer  
Fischer & Dority, P.C.  
101 Madison, Suite 400  
Jefferson City, MO 65101  
Telephone: (573) 636-6758  
Fax: (573) 636-0383

3. In this proceeding, the Commission Staff has filed a Complaint alleging that the rates of Union Electric Company ("UE") are excessive and should be reduced. KCPL is interconnected with UE's transmission system in Missouri, and may be adversely affected by ratemaking policies established in this proceeding. In particular, ratemaking policies involving depreciation practices, cost of capital, incentive regulation and other issues of importance to the electric industry as a whole are likely to be considered in this proceeding. As a result, KCPL has an interest in this proceeding that is different from that of the general public.

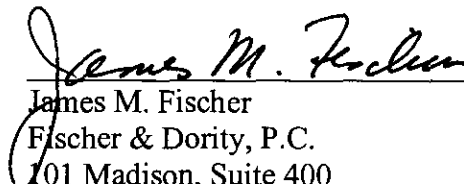
4. For the above-stated reasons, KCPL's interest in this proceeding is different from that of the general public and cannot be represented by any other party to these proceedings. Actions taken by the Commission in this proceeding may substantially affect KCPL's legal interests.

5. 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.

6. Since there is insufficient information currently available to identify all issues that may arise which will affect KCPL's interests, KCPL reserves its right to state its position and participate with regard to any matter or issue arising in this proceeding.

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

Respectfully submitted,

  
James M. Fischer #27543  
Fischer & Dority, P.C.  
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ATTORNEYS FOR  
KANSAS CITY POWER & LIGHT COMPANY

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, postage prepaid, this 5<sup>th</sup> day of November, 2001, to:

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

**General Counsel**  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

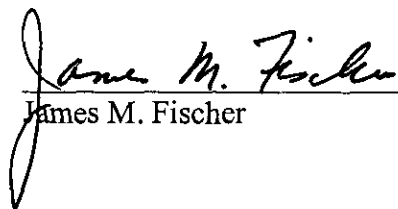
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James M. Fischer