



MARTIN J. BREGMAN
Executive Director, Law

June 6, 2000

FILED³

JUN 08 2000

Missouri Public
Service Commission

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


Re: Case No. EM-2000-753

Dear Mr. Roberts:

Enclosed for filing with the Missouri Public Service Commission please find one original and eight copies of the **Application of Western Resources, Inc. to Intervene** in the above-referenced case.

Please file-stamp the extra copy for our files and return it to Western Resources, Inc. in the enclosed prepaid, self-addressed envelope.

Sincerely,



Martin J. Bregman

clb
enc.
cc: All parties

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED³

JUN 08 2000

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.)

Missouri Public
Service Commission

Case No. EM-2000-753

APPLICATION OF WESTERN RESOURCES, INC. TO INTERVENE

COMES NOW Western Resources, Inc. (Western Resources), pursuant to 4 C.S.R. 240-2.075 of the Rules of Practice and Procedure of the Missouri Public Service Commission and for its Application to Intervene herein states as follows:

1. On May 15, 2000, Kansas City Power & Light Company (KCPL) filed an application in this docket by which it requested authority to restructure and reorganize itself, merge, transfer assets, and form subsidiary corporations as more fully set forth in the application. Among other things, KCPL proposed to create a new corporation (KCPL Power) which would hold and own KCPL's generation assets. As conceived by KCPL and described in its application, KCPL Power

will supply KCPL Delivery [a proposed new transmission and distribution company] with power and energy pursuant to a Power Supply Agreement. Pursuant to that agreement KCPL Power will supply electric energy at wholesale under terms and conditions that will ensure reliable and reasonably priced electric power will be available for distribution by KCPL Delivery to its electric utility customers. It is anticipated that, to the extent practicable given available generation and transmission capacity, KCPL Delivery also will request competitive bids from all interested suppliers of electric energy to supply new and existing load requirements.

Application, at 2-3.

2. Western Resources is a Kansas corporation in good standing in all respects, with its principal office and place of business located at 818 South Kansas Avenue, Topeka, Kansas. Western Resources, through its KPL division and its wholly owned subsidiary, Kansas Gas and Electric Company (KGE), is engaged in the generation, transmission, distribution, and sale of electric energy and power in the state of Kansas. Western Resources and KGE provide electric service to over 550,000 residential customers and approximately 80,000 commercial and industrial customers in Kansas. Western Resources and KGE are directly electrically interconnected with KCPL. KGE also has joint ownership with KCPL in the Wolf Creek Nuclear Generating Station (Wolf Creek) and the La Cynge Energy Center (La Cynge). Additionally, Western Resources sells electric power and energy to and buys electric power and energy from KCPL. Western Resources also buys and sells power to third parties in direct competition with KCPL.

3. Correspondence, communications, Orders and decisions in this Matter should be addressed to:

Martin J. Bregman
Executive Director, Law
Western Resources, Inc.
818 South Kansas Avenue
Topeka, KS 66612
Phone: (785) 575-1986
Fax: (785) 575-8136


Jim Ludwig
Senior Director, Regulatory Affairs
Western Resources, Inc.
818 South Kansas Avenue
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4. As a joint owner, through KGE, in generation with KCPL through its ownership in Wolf Creek and La Cygne and as a competitor with KCPL, Western Resources has a clear interest in this case which is different from that of the general public and which may be adversely affected by any ruling in this case. First, the application may have effects on the ownership and operation of plant jointly owned by KCPL and KGE. Second, Western Resources has a clear interest as a potential supplier of competitively priced electrical power and energy to third parties in competition with KCPL Power and to KCPL Delivery for new and existing loads since the competitive position of KCPL may be affected by any ruling in this matter. As this point, however, Western Resources is unsure of the position it will take in this proceeding.

5. By virtue of its interests in this matter, Western Resources' interests may not be represented by any other party and it has a clear right to intervene herein.

WHEREFORE, Western Resources asks that the Commission issue its order granting Western Resources the right to intervene and fully participate in this proceeding and for such other and further relief as may be proper.

Respectfully submitted,
WESTERN RESOURCES, INC.



Martin J. Bregman, MBN 25449
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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of June, 2000, copies of the foregoing **Motion to Intervene** were sent via U. S. Mail, postage prepaid, addressed to all parties on the Commission's official service list.



Martin J. Bregman