

LAW OFFICES
BRYDON, SWEARENGEN & ENGLAND

DAVID V.G. BRYDON
JAMES C. SWEARENGEN
WILLIAM R. ENGLAND, III
JOHNNY K. RICHARDSON
GARY W. DUFFY
PAUL A. BOUDREAU
SONDRA B. MORGAN
CHARLES E. SMARR

PROFESSIONAL CORPORATION
312 EAST CAPITOL AVENUE
P. O. BOX 456
JEFFERSON CITY, MISSOURI 65102-0456
TELEPHONE (573) 635-7166
FACSIMILE (573) 635-3847
E-MAIL: DUFFY@BRYDONLAW.COM

DEAN L. COOPER
MARK G. ANDERSON
TIMOTHY T. STEWART
GREGORY C. MITCHELL
RACHEL M. CRAIG
BRIAN T. MCCARTNEY
DALE T. SMITH

OF COUNSEL
RICHARD T. CIOTTONE

June 14, 2000

Mr. Dale Hardy Roberts
Executive Secretary
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. EM-2000-753
KCPL restructuring

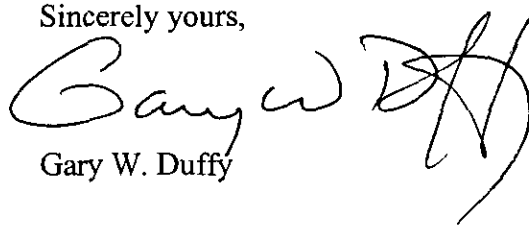
FILED²
JUN 14 2000
Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of the Application to Intervene of UtiliCorp United Inc.

If you have any questions, please give me a call.

Sincerely yours,


Gary W. Duffy

Enclosures
cc w/encl:

John Coffman, Office of Public Counsel
Dennis Frey, Office of the General Counsel
James M. Fischer
William G. Riggins, KCPL
John McKinney, MPS

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²

JUN 14 2000

Missouri Public
Service Commission

Case No. EM-2000-753

In the matter of the Application of Kansas City)
Power & Light Company for an Order Authorizing)
the Transfer of Certain Electrical 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.)

APPLICATION TO INTERVENE

COMES NOW UtiliCorp United Inc., ("UtiliCorp") through its Missouri Public Service operating division, by and through its counsel, pursuant to 4 CSR 240-2.075, and for its application to intervene in this matter respectfully states as follows:

1. UtiliCorp is a Delaware corporation. It is an electrical corporation under Chapters 386 and 393, RSMo 1994, and is a public utility regulated by the Missouri Public Service Commission ("Commission"). UtiliCorp's principal office and place of business is located at 911 Main, Suite 3000, Kansas City, MO 64105.

2. All correspondence, communications, orders, and notices in this matter should be addressed to:

Gary W. Duffy, Attorney at Law
BRYDON, SWEARENGEN & ENGLAND P.C.
312 E. Capitol Avenue
P. O. Box 456
Jefferson City, MO 65102
573-635-7166 voice
573-635-3847 facsimile
E-mail: Duffy@Brydonlaw.com

14

John W. McKinney
Missouri Public Service
10700 E. 350 Highway
P.O. Box 11739
Kansas City, MO 64138
816 936-8636 voice
816 737-7505 facsimile

3. On May 15, 2000, Kansas City Power & Light Company ("KCPL") filed its application seeking approval to restructure and reorganize itself, merge, transfer assets, and form subsidiary corporations. The Commission, by Order and Notice dated May 16, 2000, set an intervention deadline in this proceeding of June 15, 2000.

4. UtiliCorp has entered into an Agreement and Plan of Merger with The Empire District Electric Company ("Empire") in which UtiliCorp would be the surviving corporate entity. Empire has existing contractual relationships with KCPL involving the generation and transmission of electrical power and energy. Empire is a co-owner with KCPL of the Iatan Generating Station, a 650 megawatt (nominal) coal-fired generating unit, which represents a continuing and on-going relationship with KCPL in the operation and future of that plant. KCPL's ownership of that plant is apparently going to be affected by KCPL's proposal in this application with a transfer to an entity presently called KCPL Power.

5. Empire has a substantial investment in the Iatan Generating Station, and KCPL is presently the managing entity for the plant. Separately, UtiliCorp has other contractual relationships with KCPL including, but not limited to, interconnection agreements involving electrical transmission facilities. UtiliCorp is unsure of (a) whether and (b) how those relationships may be altered if the application were granted.

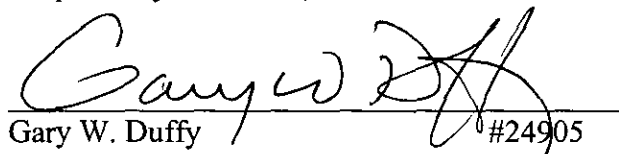
6. UtiliCorp desires to intervene and become a party to this proceeding so that it can determine whether its rights under any existing contractual relationships or its rights under

contractual relationships Empire has with KCPL may be affected by the proposed transaction. In addition, since this is the first Missouri proceeding involving the attempt of a regulated Missouri electric utility to reorganize itself into regulated and unregulated operations, UtiliCorp also desires to monitor the manner in which the Commission will process such an application, and the issues that may arise of importance to electrical corporations regulated by the Commission, such as UtiliCorp. UtiliCorp thus has an interest in this proceeding which is different from that of the general public which cannot adequately be represented by any other party to this proceeding. UtiliCorp also represents that granting it intervention would serve the public interest by allowing the perspective of a regulated electrical corporation to be represented.

7. For purposes of 4 CSR 240-2.075(2), UtiliCorp states that it currently neither supports nor opposes the relief sought by KCPL because it is not capable of determining at this time, from what has been filed by KCPL, whether any of its interests would be adversely affected if KCPL's application were granted as filed.

WHEREFORE, UtiliCorp requests an order from the Commission allowing it to intervene and participate fully as a party in this proceeding.

Respectfully submitted,

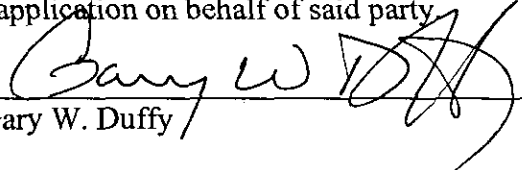

Gary W. Duffy #24905
BRYDON, SWEARENGEN & ENGLAND P.C.
312 E. Capitol Avenue
P. O. Box 456
Jefferson City, MO 65102
573-635-7166 voice
573-635-3847 facsimile
E-mail: Duffy@Brydonlaw.com

ATTORNEYS FOR UTILICORP UNITED INC.

VERIFICATION

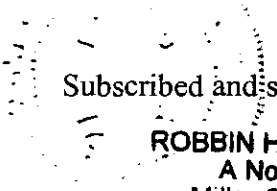
STATE OF MISSOURI)
)ss
COUNTY OF COLE)


On the 14th day of June, 2000, before me appeared Gary W. Duffy, to me personally known, who, being by me first duly sworn, states that he is the attorney for UtiliCorp United Inc. and acknowledged that he had read the above and foregoing document and that the allegations therein are true and correct to the best of his knowledge, information and belief, and that the above-designated attorneys are authorized to file said application on behalf of said party.



Gary W. Duffy

Subscribed and sworn to before me this 14th day of June, 2000.

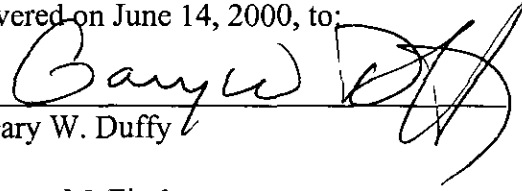

ROBBIN HENLEY GRIFFITH
A Notary Public of
Miller County, Missouri
My Commission Expires 12/28/2001



Notary Public

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was either mailed, first class postage prepaid, on hand delivered on June 14, 2000, to:



Gary W. Duffy

John Coffman
Office of the Public Counsel
Truman State Office Building
Jefferson City, Missouri

Dennis L. Frey
Assistant General Counsel
Missouri Public Service Commission
Truman State Office Building
Jefferson City, Missouri

James M. Fischer
Attorney at Law
Fischer & Dority, P.C.
101 West McCarty Street, Suite 215
Jefferson City, MO 65101

William G. Riggins/Gerald A. Reynolds
Kansas City Power & Light Company
1201 Walnut Street
P.O. Box 418679
Kansas City, MO 64141-9679