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June 14, 2000

**Via Federal Express**

The Honorable Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102-0360


**FILED<sup>2</sup>**  
JUN 15 2000  
Missouri Public  
Service Commission

Re: **Case No. EM-2000-753**

Dear Judge Roberts:

On behalf of the Missouri Energy Group, Barnes-Jewish Hospital, et al, I enclose herewith for filing an original and nine (9) copies of Application to Intervene and request that you bring this filing to the attention of the commission. I will also appreciate return of one file stamped copy in the enclosed self-addressed return enveloped.

Yours very truly,

  
Robert C. Johnson

Enclosure  
RCJ/mel

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED<sup>2</sup>  
JUN 15 2000

Missouri Public  
Service Commission

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 )

Case No. EM-2000-753

APPLICATION TO INTERVENE OF THE  
MISSOURI ENERGY GROUP

Pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, Barnes-Jewish Hospital, DaimlerChrysler Corporation, The Doe Run Company, Emerson Electric Company, Holnam Company, Inc., Lone Star Industries Inc., River Cement Company, SSM HealthCare, and Unity Health System (collectively known as the "Missouri Energy Group", and hereinafter referred to as "Applicants"), hereby apply for leave to intervene in the above-referenced proceeding. In support of this Application, Applicants respectfully state as follows:

1. Applicants own and operate not-for profit hospital systems and large industrial plants within the state of Missouri. Over a period of many years Applicants have purchased substantial amounts of electricity from Union Electric Company and other utility companies in the state of Missouri.

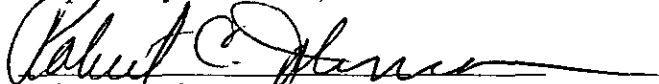
2. The matters to be considered in Docket No. EM-2000-753 and the Commission's determinations thereon, could have a significant impact on Applicants' and all utility customers cost of energy service and the manner in which it is supplied, in that the

Commission's decisions and rulings herein will establish precedent for restructuring of electric utilities in the state of Missouri and thereby affect all utility customers in the state of Missouri. Therefore, granting this proposed intervention to the Applicants would serve the public interest.

3. It is Applicants' position that their interests may be adversely affected by the transactions proposed herein. The reorganization of Kansas City Power and Light Company (KCPL) may impact Union Electric Company, which is interconnected to KCPL and is a primary supplier of electricity to Applicants. The Applicants have a direct and immediate interest in these proceedings that is different from that of the general public. While Applicants cannot assert a position on specific matters because they have insufficient information, they reserve the right to assert positions after they have had an adequate opportunity to examine the record, testimony and exhibits of other parties filed and to be filed herein.

WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicants in these proceedings, Applicants ask that the Commission grant this Application for Intervention, and thereby entitle said Applicants to have notice and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on the argument, and in all other respects to be made parties to this proceeding.

Respectfully Submitted,



Robert C. Johnson (15755)

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Attorney for Missouri Energy Group

CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Docket No. EO98-95.

Dated at St. Louis, Missouri this 14<sup>th</sup> day of June, 2000:

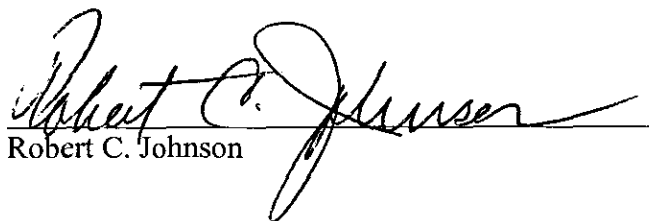
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