BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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 KCP&L Company's Plan To Restructure Itself Into a Holding Company, Competitive Generation Company, Regulated Utility Company

And Unregulated Subsidiary.

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Service Commission
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Case No. EM-2000-753

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APPLICATION FOR INTERVENTION

COMES NOW the Missouri Joint Municipal Electric Utility Commission

(MJMEUC) and, in accordance with 4 CSR 240-2.075, applies to intervene and become a party in the above-referenced case and, in support of this Application for Intervention, respectfully states as follows:

- 1. The MJMEUC is a political subdivision of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 et seq. RSMo., with authority to exercise public powers of a body corporate and politic of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MJMEUC. Fifty-five Missouri municipalities are current parties to the joint contract establishing the MJMEUC.
- 2. As a wholesale energy and transmission customer of Kansas City Power & Light Company, directly and on behalf of its contracting municipalities, the MJMEUC



and its municipalities may be adversely affected by a final order in this matter. Its interests are different from those of the general public and cannot be adequately represented by any other party. As a joint municipal utility commission with distinctive interests in this case, the public interest would be served by its proposed intervention.

- 3. At this stage, the MJMEUC is unsure of the position it will take on the various issues that may arise in the instant proceeding.
- 4. Service of all pleadings, correspondence, communications and orders and decisions of the Commission should be made to counsel as follows:

Duncan E. Kincheloe 2407 W. Ash Columbia, MO 65203 (573) 445-3279 (573) 445-0680 (fax)

WHEREFORE, having stated its grounds for intervention, the MJMEUC requests the Commission to enter its Order granting it leave to intervene as a full party in this case, and for such other and further relief as the Commission may deem appropriate.

Respectfully submitted,

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ATTORNEY FOR MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY

COMMISSION

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was delivered by first class mail to William G. Riggins and James M. Fischer, Attorneys for Kansas City Power and Light Company, to the General Counsel of the Staff of the Public Service Commission and to the Office of Public Counsel on this 15th day of June, 2000.