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June 14, 2000

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

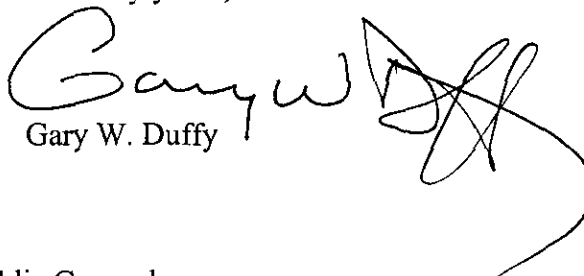
RE: Case No. EM-2000-753
KCPL restructuring

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of the Motion to Intervene of The Empire District Electric Company.

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
Bob Fancher, Empire

FILED²
JUN 14 2000
Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²
JUN 14 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

MOTION TO INTERVENE

COMES NOW The Empire District Electric Company ("Empire"), by and through its counsel, pursuant to 4 CSR 240-2.075, and for its motion to intervene in this matter respectfully states as follows:

1. Empire is a Kansas 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"). Empire's principal office and place of business is located at 602 Joplin Street, P.O. Box 127, Joplin, Missouri 64802.

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
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E-mail: Duffy@Brydonlaw.com

Robert B. Fancher, Vice President - Finance
The Empire District Electric Company
602 Joplin Street
P.O. Box 127
Joplin, Missouri 64802.
417-625-5107 voice
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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. 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. Empire is unsure of (a) whether and (b) how that relationship may be altered if the application were granted.

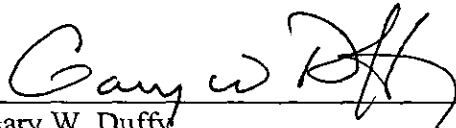
6. Empire desires to intervene and become a party to this proceeding so that it can determine whether its rights under any existing contractual relationships may be affected by the proposed transaction. In addition, since this is the first Missouri proceeding involving the attempt of a regulated Missouri electric utility to reorganize itself into regulated and unregulated operations, Empire 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 Empire. Empire 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. Empire 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), Empire 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, Empire requests an order from the Commission allowing it to intervene and participate fully as a party in this proceeding.

Respectfully submitted,



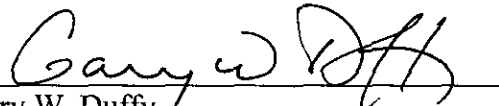
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**ATTORNEYS FOR THE EMPIRE DISTRICT
ELECTRIC COMPANY**

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 The Empire District Electric Company 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.

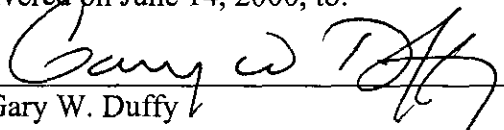
ROBERT HENLEY GRIFFITH
A Notary Public of
Miller County, Missouri
My Commission Expires 12/28/2001



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

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