

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of Kansas City	)	
Power & Light Company for Approval to Make	)	<b><u>Case No. ER-2006-0314</u></b>
Certain Changes in its Charges for Electric	)	Tariff No. YE-2006-0594
Service to Begin the Implementation of Its	)	
Regulatory Plan	)	

**PREHEARING BRIEF OF INTERNATIONAL BROTHERHOOD OF  
ELECTRICAL WORKERS, LOCAL UNIONS NO. 412, 1464 AND 1613**

COME NOW International Brotherhood of Electrical Workers, Local Unions No. 412, 1464, and 1613, (“Locals 412, 1464, and 1613” or the “Locals”) by and through their counsel, Blake & Uhlig, P.A., and respectfully states as follows to the Missouri Public Service Commission (the “Commission”)

1. By its Order Setting Procedural Schedule issued March 29, 2006, the Commission directed the parties hereto to file prehearing briefs by October 12, 2006.
2. The Petitioners represent employees who may be affected by Orders entered by the Commission in this proceeding, and, accordingly, the Petitioners and the employees they represent are interested parties in this proceeding. The Petitioners herein and the employees they represent intervened in this action because they have a direct interest in this proceeding which is different from that of the general public, and which interests cannot be adequately represented by any other party.
3. Due to the Local’s limited involvement with this case, at this time, the Locals take no positions on the issues set forth in the List of Issues filed herein by the Staff of the Commission on October 6, 2006.

Dated this 13th day of October, 2006.

Respectfully submitted,

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By: /s/ Jane L. Williams  
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ATTORNEYS FOR IBEW LOCALS 412,  
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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing *Prehearing Brief* was served upon all parties to this action, either by U.S. Mail, Hand-delivered, transmitted by Facsimile or electronically mailed, this 13th day of October, 2006, addressed as follows:

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