

NEWMAN, COMLEY & RUTH

PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS AT LAW

MONROE BLUFF EXECUTIVE CENTER

601 MONROE STREET, SUITE 301

P.O. BOX 537

JEFFERSON CITY, MISSOURI 65102-0537

TELEPHONE: (573) 634-2266

FACSIMILE: (573) 636-3306

ROBERT K. ANGSTEAD
MARK W. COMLEY
CATHLEEN A. MARTIN
STEPHEN G. NEWMAN
JOHN A. RUTH
D. GREGORY STONEBARGER

June 14, 2000

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

Re: Case No. EM-2000-753

Dear Judge Roberts:

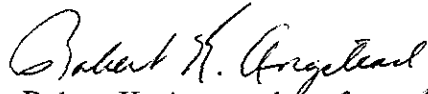
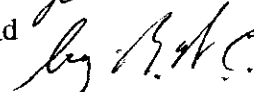
Enclosed for filing in the above referenced matter, please find the original and eight copies of an Application to Intervene.

Please contact me if you have any questions regarding this filing. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:


Robert K. Angstead 

Enclosures

cc: Office of Public Counsel
PSC General Counsel
William D. Geary
James M. Fischer
William G. Riggins

FILED²

JUN 14 2000

Missouri Public
Service Commission

FILED

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

JUN 14 2000

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)

Missouri Public
Service Commission

Case No. EM-2000-753

APPLICATION TO INTERVENE

COMES NOW the City of Kansas City, Missouri, pursuant to 4 CSR 240-2.075 of the
Rules of Practice and Procedure, and for its Application to Intervene respectfully states:

1. The City of Kansas City, Missouri, is a municipality of the State of Missouri.
2. Correspondence, communications, orders and the decision in this matter should be

addressed to:

William D. Geary
Assistant City Attorney
2700 City Hall
414 E. 12th St.
Kansas City, MO 64106
Telephone No.: 816/513-3118
Fax No.: 816/513-3133

Mark W. Comley
Robert K. Angstead
Newman, Comley & Ruth P.C.
P.O. Box 537
Jefferson City, MO 65102-0537
Telephone No.: 573/634-2266
Fax No.: 573/636-3306

3. This case arose when Kansas City Power & Light Company (KCPL) filed an

itself to create a holding company, a competitive generation company, a regulated utility company and an unregulated subsidiary. On May 16, 2000, the Commission issued an order and notice directing that interested parties wishing to intervene must do so on or before June 15, 2000. This application is therefore timely.

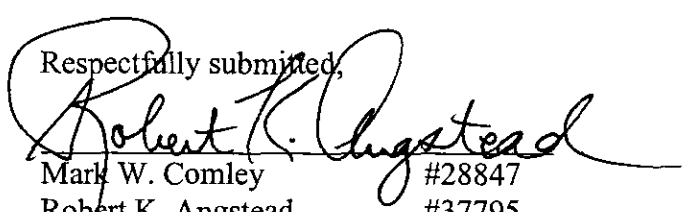
4. Kansas City is interested in the impact of any decisions in this proceeding on behalf of itself and its residents and businesses. It desires to participate fully in this proceeding including hearing and the briefing of the issues.

5. At this time, Kansas City is uncertain of the position it will take in this matter.

6. Granting the proposed intervention would serve the public interest.

WHEREFORE, for the foregoing reasons, the City of Kansas City, Missouri, respectfully requests that the Commission grant its Application to Intervene in this matter, and thereby entitle the City to have notice and to appear at the taking of testimony, to produce and cross-examine witnesses and to be heard on the argument, and in all other respects fully participate in this proceeding.

Respectfully submitted,


Mark W. Comley

#28847

Robert K. Angstead

#37795

NEWMAN, COMLEY & RUTH P.C.

601 Monroe Street, Suite 301

P.O. Box 537

Jefferson City, MO 65102-0537

(573) 634-2266

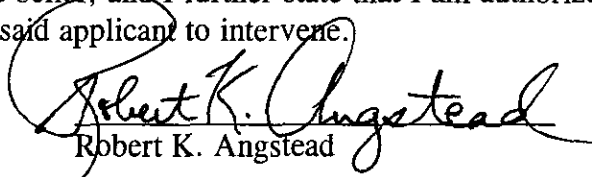
(573) 636-3306 (FAX)

Attorneys for City of Kansas City, Missouri

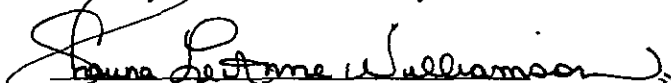
ATTORNEY VERIFICATION

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

I, Robert K. Angstead, being first duly sworn, do hereby certify, depose and state that I am the attorney for The City of Kansas City, Missouri which seeks intervention in the above captioned proceeding before the Missouri Public Service Commission; that I have read the above and foregoing Application to Intervene and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing application by the above said applicant to intervene.


Robert K. Angstead

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


Notary Public

My Commission expires:

Shawna LeAnne Williamson
Notary Public - State of Missouri
County of Monteau

My Commission Expires 08/13/2002

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, on this 14th day of June, 2000, to:

Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

William G. Riggins
General Counsel
KCP&L
1201 Walnut
Kansas City, MO 64106

General Counsel
Mo. Public Service Commission
PO Box 360
Jefferson City, MO 65102

James M. Fischer
101 W. McCarty St., Suite 215
Jefferson City, MO 65101


Robert K. Angstead