

LAW OFFICES
BLAKE & UHLIG, P.A.

475 NEW BROTHERHOOD BLDG.
753 STATE AVENUE
KANSAS CITY, KANSAS 66101

913/321-8884

913/321-2396 TELEFAX



MISSOURI OFFICE
2500 HOLMES
KANSAS CITY, MO 64108
816/472-8883

NEBRASKA OFFICE
1821 CALIFORNIA STREET
OMAHA, NE 68102
402/345-9449
402/345-8204 FAX

JOHN J. BLAKE*
RICHARD L. CALCARA*
JOSEPH W. MORELAND
ROBERT L. DAMERON
THOMAS H. MARSHALL
JAMES R. "DICK" WAERS
MICHAEL T. MANLEY
MICHAEL J. STAPP
G. GORDON ATCHESON**
ROBERT J. HENRY***
CURTIS G. BARNHILL
CHARLES R. SCHWARTZ*
MARTIN W. WALTER
ANITA O'NEIL

ROBERT L. UHLIG (1929-1981)
RICHARD B. THOMPSON (1952-1981)

June 14, 2000

* ADMITTED IN KANSAS
** ADMITTED IN KANSAS, MISSOURI AND NEBRASKA
*** ADMITTED IN MISSOURI, NEBRASKA AND WASHINGTON, D.C.
ALL OTHERS ADMITTED IN KANSAS AND MISSOURI

Executive Secretary
Missouri Public Service Commission
310 W. High Street
Suite 530
Jefferson City, Missouri 65101

UNITED PARCEL SERVICE
NEXT DAY AIR

FILED²
JUN 15 2000

Missouri Public
Service Commission

Re: Case No. EM-2000-753

Dear Sir:

Enclosed for filing with the Commission are the original and six copies of an Application to Intervene With Suggestions on behalf of IBEW Local Union Nos. 412, 1464, and 1613. A copy of this filing has been served on the parties listed in the Certificate of Service. Thank you for your assistance in this matter. Please feel free to contact me if you have any questions.

Very truly yours,

James R. Waers

JRW/nmd
Enclosures

cc: Mr. Ray Marvin
Mr. Robert Madrigal
Mr. Mike Long
John B. Coffman, Deputy Public Counsel
James M. Fischer, Esq.
James J. Cook
Steven Dottheim, Missouri Public Service Commission
William G. Riggins/Gerald A. Reynolds

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

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 Electric 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 WITH SUGGESTIONS

COME NOW International Brotherhood of Electrical Workers, Local Unions No. 412, 1464, and 1613, by and through their counsel, and respectfully submit this Application to Intervene With Suggestions pursuant to Rule 82-1-225, Rules of Practice and Procedure. In support of this Application, the Petitioners state as follows:

1. Locals 412, 1464 and 1613 are voluntary labor organizations doing business and representing employees in the State of Missouri. The Locals are also labor organizations as defined in the National Labor Relations Act, as amended, 29 U.S.C. § 152, *et seq.* The three Local Unions have separate collective bargaining agreements with Kansas City Power & Light Company and represent certain employees of KCP&L.

2. The names, addresses, and telephone numbers of the Petitioners seeking leave to intervene are:

Ray Marvin, Business Manager
IBEW Local Union No. 412
6200 Connecticut, Suite 105
Kansas City, Missouri 64120
(816) 231-4530

Robert N. Madrigal, Business Manager
IBEW Local Union No. 1464
6200 Connecticut, Suite 105
Kansas City, Missouri 64120
(816) 231-1464

Mike Long, Business Manager
IBEW Local Union No. 1613
6200 Connecticut, Suite 105
Kansas City, Missouri 64120
(816) 241-1613

Counsel: James R. Waers
Blake & Uhlig, P.A.
753 State Avenue
Suite 475
Kansas City, Kansas 66101
(913) 321-8884

3. The Petitioners request that service be made to the Petitioners and their counsel.

4. 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 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.

5. The Petitioners have no current position regarding the Application herein. However, to the extent that said Application may impact on the wages, benefits, and terms and conditions of employment of the employees that the Petitioners represent, Petitioners reserve

the right to participate in the proceedings to the extent necessary to protect the interests of their members.

6. No party will be adversely affected if this petition is granted.

WHEREFORE, having stated the grounds for intervention, their position and interest in this proceeding, International Brotherhood of Electrical Workers, Local 412, International Brotherhood of Electrical Workers, Local 1464 and International Brotherhood of Electrical Workers, Local 1613 request that the Commission:

- A. Grant them leave to intervene in this proceeding on their behalf and on behalf of their members and to be heard at such time as the Commission may fix; and
- B. In all respects be a party to this proceeding.

Dated this 14th day of June, 2000.

Respectfully submitted,

BLAKE & UHLIG, P.A.
753 State Avenue
Suite 475
Kansas City, Kansas 66101
(913) 321-8884

2500 Holmes
Kansas City, Missouri 64108
(816) 472-8883

By


James R. Waers

Missouri Bar No. 26220

ATTORNEYS FOR IBEW LOCALS 412,
1464, AND 1613

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **APPLICATION TO INTERVENE WITH SUGGESTIONS** was served upon all parties to this action, by causing the same to be deposited in the United States Mail, postage prepaid, this 14th day of June, 2000, addressed as follows:

John B. Coffman, Deputy Public Counsel
Office of Public Counsel
P.O. Box 7800
Jefferson City, Missouri 65102

James M. Fischer, Esq.
Fischer & Dority, P.C.
101 West McCarty Street, Suite 215
Jefferson City, Missouri 65101

James J. Cook
AmerenUE
One Ameren Plaza
1901 Chouneau Avenue
P.O. Box 66149
St. Louis, Missouri 63166-6149

Steven Dottheim, General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

William G. Riggins/Gerald A. Reynolds
Kansas City Power & Light Company
1201 Walnut
P.O. Box 418679
Kansas City, Missouri 64141-9679

