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June 14, 2000

**Via Federal Express**

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

**FILED<sup>2</sup>**  
JUN 15 2000  
Missouri Public  
Service Commission

Re: Case No. EM-2000-753

Dear Judge Roberts:

Enclosed for filing in the above-referenced case are an original and fourteen (14) copies of the Missouri Industrial Energy Consumers' Application to Intervene. Copies of this pleading will be served on those persons designated in the Commission's May 16 *Order and Notice* in this case.

Thank you for your assistance in bringing this filing to the attention of the Commission

Very truly yours,



Diana M. Vuylsteke

DMV:dv

cc: William G. Riggins  
James M. Fischer  
Office of the Public Counsel

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

JUN 15 2000

Missouri Public  
Service Commission

Case No. EM-2000-753

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 )

APPLICATION TO INTERVENE

Comes now Adam's Mark Hotel, Alcoa Foil Products, Anheuser-Busch, The Boeing Company, General Motors Corporation, Ford Motor Company, Hussman Refrigeration, Holnam, ISP Minerals, Mallinckrodt, MEMC Electronic Materials, Monsanto, Procter & Gamble Manufacturing, Precoat Metals and Ralston Purina, hereafter referred to as the Missouri Industrial Energy Consumers ("MIEC"), and pursuant to 4 CSR 240-2.075 and 4 CSR 240-2.080, files its Application to Intervene. In support of its Application to Intervene, the MIEC states as follows:

1. The MIEC is a group of large industrial consumers of electricity. Two of the individual members of the MIEC are served by Kansas City Power & Light Company ("KCPL"), and the rest are served by AmerenUE.
2. KCPL's Application in this case will affect its large customers. It may also affect other large utility customers in Missouri, because the proposals in KCPL's Application are novel and will require the Commission to address a number of important issues for the first time. The determination of these issues could impact all Missouri utilities and their customers.

3. As an organization of large customers, the MIEC's interest in this case is different than that of the general public.

4. The MIEC does not yet have sufficient information to take a position regarding KCPL's application, but reserves the right to take positions on all issues that may affect its members in this case.

5. Granting the MIEC's proposed intervention would serve the public interest by assisting the development of a more complete record for decision by the Commission.

WHEREFORE, the MIEC requests that the Commission grant its Application to Intervene herein and make it a party to this case for all purposes.

Respectfully submitted,

BRYAN CAVE, LLP

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed to all counsel of record as shown on the Commission's official service list this 14<sup>th</sup> day of June, 2000.

*Diana Vuylsteke*