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JOHN A. RUTH

D. GREGORY STONEBARGER

June 15, 2000

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:

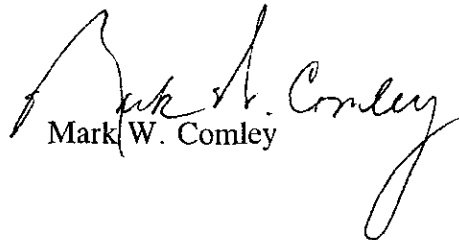
Enclosed for filing in the above referenced matter, please find the original and eight copies of an Application to Intervene of LaCledde Gas Company.

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

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:

  
Mark W. Comley

MWC/slw

Enclosures

cc: Office of Public Counsel  
PSC General Counsel  
Michael C. Pendergast  
James M. Fischer  
William G. Riggins

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

**FILED<sup>2</sup>**

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 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

**APPLICATION TO INTERVENE  
OF LACLEDE GAS COMPANY**

**Comes Now** Laclede Gas Company ("Laclede" or "Company") and pursuant to 4 CSR 240-2.075 of the Commission's Rules of Practice and Procedure, files its Application to Intervene. In support of its Application, Laclede states as follows:

1. Laclede is a public utility incorporated under the laws of the state of Missouri, with its principal office located at 720 Olive Street, St. Louis, Missouri 63101. Laclede is engaged in the business of distributing and transporting natural gas (and to a limited extent distributing liquefied petroleum gas) to residential, commercial and industrial customers located in the City of St. Louis and in Counties throughout Eastern Missouri, including the Counties of St. Louis, St. Charles, Crawford, Jefferson, Franklin, Iron, Ste. Genevieve, St. Francois, Madison, and Butler. Laclede provides such services as a gas corporation subject to the jurisdiction of the Missouri Public Service Commission (the "Commission").

2. Communications in regard to this Application should be addressed to:

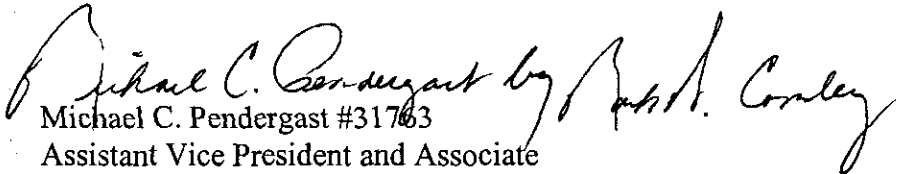
Michael C. Pendergast  
Assistant Vice President & Associate General Counsel  
Laclede Gas Company  
720 Olive Street, Room 1520  
St. Louis, MO 63101  
(314) 342-0532

3. On May 15, 2000, Kansas City Power & Light Company ("KCPL") filed an application with the Commission requesting that the Commission authorize KCPL to restructure itself to create a holding company, a competitive generation company, a regulated utility company and an unregulated subsidiary. KCPL's proposed restructuring may in the future alter, in meaningful ways, the manner in which elective service has traditionally been provided in Missouri by providing a regulatory blueprint for similar restructurings by other electric utilities. As a local natural gas distribution company that competes with electric companies to serve the energy requirements of Missouri consumers, Laclede has a direct and obvious interest in such restructuring proposals that is different from that of the general public. Laclede should accordingly be permitted to intervene and participate in this proceeding.

4. Until Laclede has had an opportunity to more fully evaluate KCPL's proposals, it will not be able to take a position on whether to support or oppose all or certain aspects of the relief requested by KCPL.

**Wherefore**, for the foregoing reasons, Laclede Gas Company respectfully requests that it be permitted to intervene and participate in this proceeding.

Respectfully requested,

  
Michael C. Pendergast #31763

Assistant Vice President and Associate  
General Counsel

Laclede Gas Company  
720 Olive Street, Room 1520  
St. Louis, MO 63101  
(314) 342-0532 Phone  
(314) 421-1979 Fax

**CERTIFICATE OF SERVICE**

Michael C. Pendergast, Assistant Vice President and Associate General Counsel for Laclede Gas Company, hereby certifies that the foregoing Application to Intervene of Laclede Gas Company has been duly served upon the Office of the Public Counsel, and William G. Riggins and James M. Fischer, attorneys for KCPL, by placing a copy thereof in the United States mail, postage prepaid, or by hand delivery, on this 15th day of June, 2000.

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

State of Missouri                    )  
  ) SS.  
County of St. Louis                )

I, Michael C. Pendergast, being first duly sworn verify that I: am an attorney for Laclede Gas Company ("Laclede"), licensed to practice law in the State of Missouri; have been authorized to file the foregoing Application to Intervene of Laclede Gas Company; and that the foregoing is correct to the best of my knowledge, information and belief.

  
Michael C. Pendergast

Subscribed and sworn to before me this 15<sup>th</sup> day of June, 2000.



My Commission expires:

06/27/2002

PATRICIA P. HICKS  
Notary Public — Notary Seal  
STATE OF MISSOURI  
City of St. Louis  
My Commission Expires: June 27, 2002