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September 15, 1998

FILED

SEP 15 1998

Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

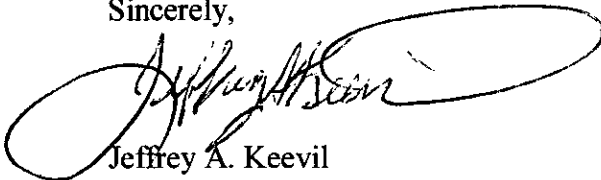
RE: In the Matter of the Assessment Against the Public Utilities in the State of
Missouri – Case No. OO-99-44

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case are an original and fourteen (14)
copies of an **APPLICATION FOR INTERVENTION** on behalf of Trigen-Kansas City
Energy Corporation.

Copies of this filing have on this date been mailed or hand-delivered to counsel
for parties of record. Thank you for your attention to this matter.

Sincerely,



Jeffrey A. Keevil

JAK/er

Enclosures

cc: counsel of record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

SEP 15 1998

Missouri Public
Service Commission

In the Matter of the Assessment Against)
the Public Utilities in the State of Missouri)
for the Expenses of the Commission for)
the Fiscal Year Commencing July 1, 1998.)

Case No. OO-99-44

APPLICATION FOR INTERVENTION

COMES NOW Trigen-Kansas City Energy Corporation ("Trigen"), and for its
Application for Intervention pursuant to 4 CSR 240-2.075, respectfully states as follows:

1. Trigen is a regulated steam heating company pursuant to Chapters 386 and 393 RSMo, and as such is subject to assessment as a public utility for expenses of the Missouri Public Service Commission. In fact, Trigen is the **sole** regulated purely steam heating company in the State of Missouri; as such, it has an interest in this proceeding which is different from that of the general public and which cannot be adequately represented by any other participant in this proceeding. Furthermore, granting its intervention will aid the Commission by bringing a unique perspective to the proceeding.

2. Although Trigen has insufficient information to state definitively at this time whether it supports or opposes the relief sought by Applicants, based on what information it does possess it generally supports the position of Applicants at this time; furthermore, Trigen has an interest in the amount and lawfulness of its assessment, particularly in light of the fact that its assessment has more than doubled since last year.

3. Although in an Order dated August 5, 1998, the Commission set an intervention date of August 31, 1998, Trigen submits that good cause exists to grant its

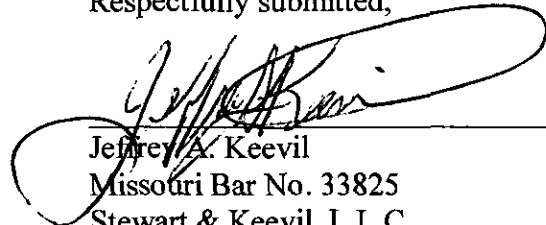
intervention in this case since it did not receive notice or a copy of said Order, and only recently learned of the creation of this docket. Since learning of the creation of the docket, Trigen has acted as expeditiously as possible to submit this intervention. Furthermore, Trigen will accept the current state of the record in this docket, and does not intend for its intervention herein to cause undue delay in the process of this case. Also, as set forth above, Trigen is the only regulated pure heating company in the State, and therefore is the only party which can adequately protect and represent its interests. Good cause therefore exists to grant this intervention past the August 31 intervention date.

4. Service of all pleadings, correspondence, communications and orders and decisions of the Commission should be made to counsel as follows:

Jeffrey A. Keevil
Stewart & Keevil, L.L.C.
Cherry Street Centre
1001 Cherry Street, Suite 302
Columbia, Missouri 65201

WHEREFORE, Trigen submits that good cause exists to grant its intervention pursuant to 4 CSR 240-2.075, and requests that the Commission issue an Order granting it intervention herein with full status as a party to this proceeding.

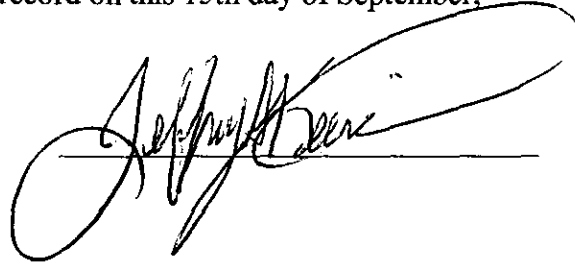
Respectfully submitted,



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ATTORNEY FOR TRIGEN- KANSAS
CITY ENERGY CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was delivered by first-class mail, or hand-delivery, to counsel for parties of record on this 15th day of September, 1998.

A handwritten signature in black ink, appearing to read "Jeffrey H. Kline", is written over a horizontal line.