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OF COUNSEL  
RICHARD T. CIOTTONE

January 14, 2000

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

**FILED**

JAN 14 2000

GA-2000-422

**Re: Application of St. Joseph Light & Power Company**

Missouri Public  
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the referenced case on behalf of St. Joseph Light & Power Company, please find an original and fourteen copies of an application.


Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

I thank you in advance for your cooperation in this matter.

Sincerely yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

  
James C. Swearingen

JCS/lar

Enclosure

cc: William Haas

John Coffman, Office of the Public Counsel

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

JAN 14 2000

Missouri Public  
Service Commission

In the Matter of the Application of )  
St. Joseph Light & Power Company for )  
a Certificate of Convenience and )  
Necessity authorizing it to install, )  
own, acquire, construct, operate, )  
control, manage and maintain natural )  
gas plant and facilities, including a )  
natural gas distribution system, and to )  
furnish natural gas service to the public, )  
in a service area in portions of Andrew, )  
Atchison, Holt and Nodaway Counties, )  
Missouri. )

Case No. GA-2000-422

**APPLICATION**

COMES NOW St. Joseph Light & Power Company ("SJLP") pursuant to Section 393.170, RSMo 1994, as amended, and 4 CSR 240-2.060 and for its Application respectfully states as follows to the Missouri Public Service Commission ("Commission"):

1. SJLP is a Missouri corporation with its principal office and place of business located at 520 Francis Street, St. Joseph, Missouri 64501. SJLP is engaged as a public utility, subject to the jurisdiction of the Commission, in providing natural gas, industrial steam and electrical service to customers in portions of northwest Missouri. SJLP's documents of incorporation have been filed with the Commission in its Case No. EA-89-80 and said documents are incorporated herein by reference, collectively, and made a part hereof for all purposes in accordance with 4 CSR 240-2.060(2)(E). A Certificate of Corporate Good Standing issued by the Missouri Secretary of State is marked Appendix 1, attached hereto, and made a part hereof for all purposes.

2. All communications, notices, pleadings, orders and decisions in regard to this application and proceeding should be addressed to:

Terry F. Steinbecker  
President and Chief Executive Officer  
St. Joseph Light & Power Company  
520 Francis Street  
P.O. Box 998  
St. Joseph, MO 64502

James C. Swearengen  
Brydon, Swearengen & England P.C.  
312 East Capitol  
P.O. Box 456  
Jefferson City, MO 65102

3. SJLP's Missouri service areas for its natural gas operations are located in portions of Andrew, Atchison, Holt and Nodaway Counties, Missouri. SJLP provides said service pursuant to certificates granted to it or its predecessors in interest in the following cities, towns and communities, together with the immediate environs of such locations:

Andrew County, Missouri  
Bolckow

Holt County, Missouri  
Bigelow  
Craig  
Forest City  
Maitland  
Mound City  
Oregon

Atchison County, Missouri  
Fairfax  
Rock Port  
Tarkio

Nodaway County, Missouri  
Barnard  
Graham  
Maryville  
Ravenwood  
Skidmore

4. At the request of the Commission Staff and in accordance with a Stipulation and Agreement approved by the Commission in Case No. GR-99-246, SJLP will file with the Commission proposed tariff sheets designed to describe its natural gas service territory in a manner utilizing land sections, to the maximum extent practical, to more clearly define said service territory. In this regard and also in accordance with said Stipulation and Agreement, SJLP agreed to obtain from the Commission any certificate(s) of public convenience and necessity necessary to implement

said tariff filing.

5. To satisfy the terms of said Stipulation and Agreement, by this Application, SJLP seeks to certificate, on a single area certificate basis, those areas in Andrew, Atchison, Holt and Nodaway Counties, Missouri, which SJLP now serves or holds itself out to serve under prior certificates granted to it or its predecessors in interest. A grant of the requested certificate clearly defining SJLP's service territory will allow SJLP to thereafter file tariffs describing its natural gas service territory in a manner utilizing land sections as provided in said Stipulation and Agreement. Moreover, the consolidation of those areas in said counties in a single certificate will promote the public convenience and necessity because the service area in which SJLP may extend its facilities to serve the public from its present system, or from the system which it may have in existence at any given time in the future, will be more specifically and clearly defined thereby eliminating any confusion or ambiguity which might now exist. As a consequence, prospective customers adjacent to the then existing system will be able to receive natural gas service as promptly as possible and at minimum expense, in conformance with SJLP's extension rule now in effect or the extension rule which SJLP may have in effect at some future date.

6. Because of the foregoing, SJLP requests permission, approval, and a certificate of convenience and necessity to install, own, acquire, construct, operate, control, manage and maintain natural gas plant and facilities, including a natural gas distribution system, and to render natural gas service to the public in a service area which includes portions of Andrew, Atchison, Holt and Nodaway, Counties, Missouri. Marked Appendix 2, attached hereto and made a part hereof for all purposes, is a description of the proposed service area in a township/Range/Section format. Marked Appendix 3, attached hereto and made a part hereof for all purposes, is a series of four (4) maps which show the area proposed to be certificated herein.

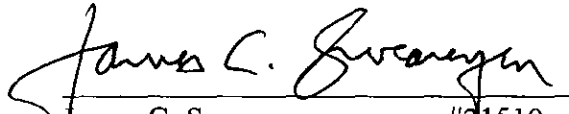
7. Marked Appendix 4, attached hereto and made a part hereof for all purposes, is a verified statement of the President and Secretary of SJLP showing that SJLP has received the required consent of the proper authorities for those cities or counties located within the area sought to be certificated.

8. Because this Application is intended and designed to consolidate and more clearly define SJLP's existing service areas in order to permit compliance with the Stipulation and Agreement approved by the Commission in Case No. GR-99-246, SJLP desires that the Commission waive or grant a variance to the certificate application requirements of 4 CSR 240-2.060(2)(F) concerning utility services available in the area; the names and addresses of residents in the area; a metes and bounds description of the area to be certificated; a plat; and a feasibility study.

9. SJLP will render service under the requested certificate pursuant to its tariffs, rules and regulations which are on file with and approved by the Commission or which may subsequently be filed with and approved by the Commission. Any additions to SJLP's natural gas facilities pursuant to said certificate will be financed from funds from the treasury of SJLP and said additions will conform to all lawful requirements of the Commission.

WHEREFORE, SJLP requests the Commission to waive or grant a variance from the requirements of 4 CSR 240-2.020(2)(F) and to issue its order granting SJLP a certificate of convenience and necessity authorizing it to install, own, acquire, construct, operate, control, manage and maintain natural gas plant and facilities, including a natural gas distribution system, and to furnish natural gas service to the public in a service area which includes portions of Andrew, Atchison, Holt and Nodaway Counties, Missouri, all as described in Appendix 2 hereto and for such further orders as the Commission shall deem appropriate.

Respectfully submitted,



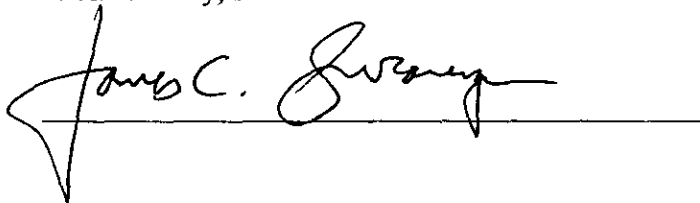
James C. Swearingen #21510  
Brydon, Swearingen & England P.C.  
P.O. Box 456  
Jefferson City, MO 65102-0456  
Telephone (573) 635-7166  
Facsimile (573) 635-0427

Attorney for St. Joseph Light & Power Company

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, or hand-delivered, on this 14<sup>TH</sup> day of JANUARY, 2000, to:

The Office of the Public Counsel  
Truman Building, Room 250  
P.O. Box 7800  
Jefferson City, MO 65102-7800





Appendix 1 - Certificate of Corporate Good Standing issued by the Missouri Secretary of State

Appendix 2 - Description of the Proposed Service Area in a Township/Range/Section format

Appendix 3 - Maps showing the area proposed to be certificated

Appendix 4 - Verified statement of the President and Secretary of SJLP showing that SJLP has received the required consent of the proper authorities for those municipalities located within the area sought to be certificated

No. 00000180A

# STATE OF MISSOURI



**Rebecca McDowell Cook**  
**Secretary of State**

CORPORATION DIVISION

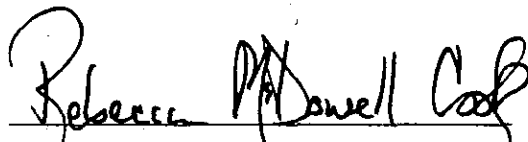
## CERTIFICATE OF CORPORATE GOOD STANDING

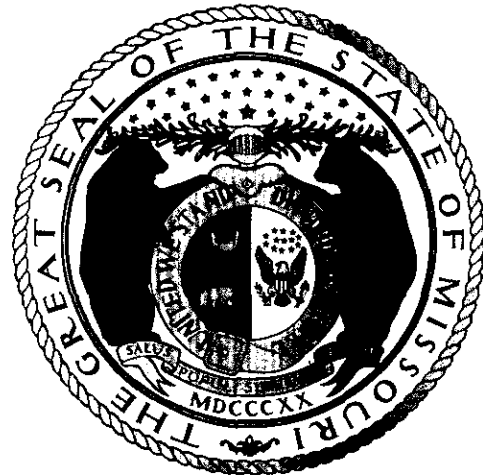
I, REBECCA McDOWELL COOK, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

ST. JOSEPH LIGHT & POWER COMPANY

was incorporated under the laws of this State on the 8th day of NOVEMBER, 1895, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I have set my hand and imprinted the GREAT SEAL of the State of Missouri, on this, the 12th day of JANUARY, 2000.

  
Secretary of State



**DESCRIPTION OF AUTHORIZED GAS SERVICE TERRITORY**

**Andrew County**

<u>Township</u>	<u>Range</u>	<u>Sections</u>
61N	34W	6,7,18,19
61N	35W	1,2,3,4,5,8,9,10,11,12,13,14,15,16,17,20,21,22,23,24

**Atchison County**

<u>Township</u>	<u>Range</u>	<u>Sections</u>
63N	39W	5,6,7,8,17,18
63N	40W	1,2,3,4,5,9,10,11,12,13,14,15,16
64N	39W	5,6,7,8,17,18,19,20,29,30,31,32
64N	40W	1-30,32,33,34,35,36
64N	41W	1-12
64N	42W	1,2,3,4,10,11,12
65N	39W	6,7,18,19,30,31
65N	40W	1,2,3,4,5,7-36
65N	41W	7-36
65N	42W	22,23,24,25,26,27,28,33,34,35,36
66N	39W	31,32
66N	40W	34,35,36

**Holt County**

<u>Township</u>	<u>Range</u>	<u>Sections</u>
59N	37W	6
59N	38W	1-12
59N	39W	1,2,3,11,12
60N	37W	18,19,30,31
60N	38W	4,5,6,7,8,9,13-36
60N	39W	1,2,3,4,5,8,9,10,11,12,13,14,15,16,17,21,22,23,24,25,26,27,28,34,35,36
61N	38W	3,4,5,6,7,8,9,10,15,16,17,18,19,20,29,30,31,32,33
61N	39W	1-30,32,33,34,35,36

DESCRIPTION OF AUTHORIZED GAS SERVICE TERRITORY (Continued)

Holt County (Continued)

<u>Township</u>	<u>Range</u>	<u>Sections</u>
62N	37W	3, 4, 5, 6, 7, 8, 9, 15, 16, 17, 18, 19, 20, 21, 22
62N	38W	1, 12, 15, 16, 17, 18, 19, 20, 21, 22, 27, 28, 29, 30, 31, 32, 33, 34
62N	39W	5, 6, 7, 8, 13, 14, 15, 17, 18, 19, 20, 22, 23, 24, 25, 26, 27, 29, 30, 31-36
62N	40W	1, 2, 3, 4, 9, 10, 11, 12, 13, 14, 15, 16, 21-28
63N	37W	19, 20, 21, 27, 28, 29, 30, 31, 32, 33, 34
63N	38W	24, 35, 36
63N	39W	19, 20, 29, 30, 31, 32
63N	40W	21, 22, 23, 24, 25, 26, 27, 28, 33, 34, 35, 36


Nodaway County

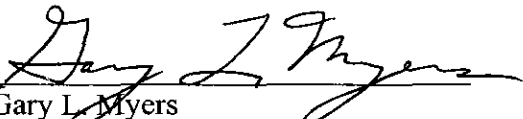
<u>Township</u>	<u>Range</u>	<u>Sections</u>
62N	34W	6, 7, 18, 19, 30, 31
62N	35W	1, 2, 3, 4, 5, 8-17, 20-29, 32, 33, 34, 35, 36
62N	36W	6, 7, 18, 19
62N	37W	1, 2, 3, 9-16, 22, 23, 24
63N	33W	5, 6
63N	34W	1, 2, 3, 6, 7, 18, 19, 30, 31
63N	35W	1-16, 21-28, 33, 34, 35, 36
63N	36W	1, 2, 3, 30, 31
63N	37W	2-11, 14, 15, 16, 17, 18, 21, 22, 23, 25, 26, 27, 28, 34, 35, 36
63N	38W	1, 12, 13
64N	33W	4-9, 16, 17, 18, 19, 20, 21, 28-32
64N	34W	1, 2, 3, 6, 7, 10-15, 18, 19, 22-27, 30, 31, 34, 35, 36
64N	35W	1-36
64N	36W	1, 2, 3, 10-15, 22-27, 34, 35, 36
64N	37W	26-35
64N	38W	25, 36
65N	33W	31, 32
65N	34W	34, 35, 36
65N	35W	31, 32, 33, 34
65N	36W	34, 35, 36

State of Missouri )  
 )  
County of Buchanan )

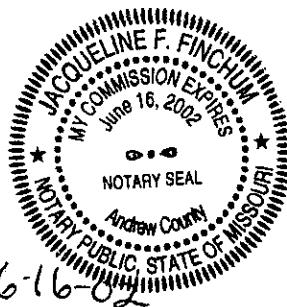
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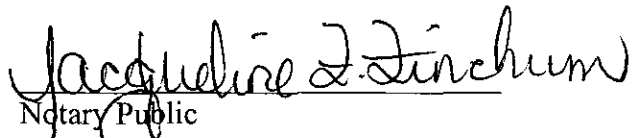
Terry F. Steinbecker and Gary L. Myers, the President and Secretary, respectively, of St. Joseph Light & Power Company, do hereby upon their oath swear and affirm that St. Joseph Light & Power Company has received the required consents of all of the required cities or counties to serve same within the area sought to be certificated by this application.

  
Terry F Steinbecker

  
Gary L. Myers

Subscribed and sworn before me this 13<sup>th</sup> day of January, <sup>2000</sup>~~1999~~.



  
Notary Public

My Commission expires: 6-16-02