

June 5, 2000

VIA FEDERAL EXPRESS



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

FILED²
JUN 6 2000
Missouri Public
Service Commission

Re: MPSC Case No. EM-2000-753

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company, d/b/a AmerenUE, in the above matter, please find an original and eight (8) copies of its **Application to Intervene**.

Kindly acknowledge receipt of this filing by stamping a copy of the enclosed letter and returning it to me in the enclosed self-addressed envelope.

Very truly yours,

A handwritten signature in cursive script, appearing to read "James J. Cook".

James J. Cook
Managing Associate General Counsel

JJC/db
Enclosures

cc: Mr. William G. Riggins
Parties on Attached Service List

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

JUN 6 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 OF UNION ELECTRIC COMPANY TO INTERVENE

COMES NOW Union Electric Company, d/b/a AmerenUE ("AmerenUE"), and pursuant to 4 CSR 240-2.075 applies to intervene in the above-captioned matter and to become a party therein. In support thereof, AmerenUE states as follows:

1. AmerenUE is a corporation duly organized and existing under the laws of the State of Missouri, with its principal office located at 1901 Chouteau Avenue, St. Louis, Missouri 63103, and is an electrical corporation and public utility as defined in Section 386.020, RSMo. (1996). AmerenUE is engaged in providing electric, gas and steam heating services in portions of Missouri as a public utility under the jurisdiction of the Commission. AmerenUE is also engaged in providing electric and gas service in portions of Illinois.

2. In this case, Kansas City Power & Light Company ("KCPL"), among other things, requests an order from the Commission authorizing its plan to restructure itself into a Holding Company, Competitive Generation Company, Regulated Utility Company and Unregulated Subsidiary.

3. AmerenUE seeks intervention because AmerenUE and KCPL have contiguous service areas in certain parts of the State of Missouri, and AmerenUE's transmission system is

interconnected with KCPL's transmission system. In addition, there are various agreements between AmerenUE and KCPL that could be impacted by the Commission's action on this matter. Therefore, AmerenUE may be directly impacted by the outcome of this proceeding. Furthermore, AmerenUE's interest in this matter is different from that of the general public and cannot be represented adequately by any other party to this proceeding.

4. There is insufficient information currently available to identify individual issues that may arise in this case that may affect AmerenUE's interests. Consequently, AmerenUE reserves its right to take a position and participate with regard to any matter or issue arising in this case that may affect AmerenUE's interests.

WHEREFORE, for the foregoing reasons, AmerenUE requests that the Commission grant its Application to Intervene and allow it to become a party to this proceeding.

Respectfully submitted,

UNION ELECTRIC COMPANY d/b/a
AmerenUE

By: 

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CERTIFICATE OF SERVICE

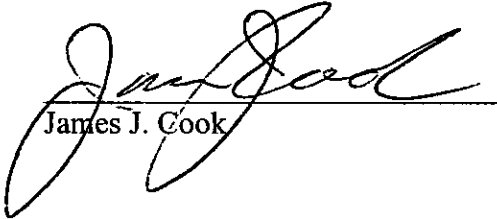
I hereby certify that a copy of the foregoing document was served on the following parties of record via first-class, U.S. mail on this 5th day of June, 2000:

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James J. Cook