

**FISCHER & DORITY**  
PROFESSIONAL CORPORATION

James M. Fischer  
Larry W. DORITY

Attorneys at Law  
Regulatory & Governmental Consultants

101 Madison, Suite 400  
Jefferson City, MO 65101  
Telephone: (573) 636-6758  
Fax: (573) 636-0383

November 28, 2000

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
200 Madison Street, Suite 100  
P.O. Box 360  
Jefferson City, Missouri 65102

RE: *Missouri Gas Energy*  
Case No. GR-2001-292

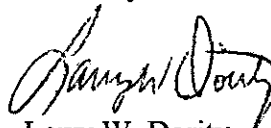
**FILED<sup>2</sup>**  
NOV 28 2000  
Missouri Public  
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are an original and eight (8) copies of the Application to Intervene of Kansas City Power & Light Company. A copy of the foregoing Application to Intervene has been hand-delivered or mailed this date to each party of record.

Thank you for your attention to this matter.

Sincerely,

  
Larry W. DORITY

/jr  
Enclosures

cc: Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED<sup>2</sup>  
NOV 28 2000

In the Matter of Tariff Revisions of Missouri )  
Gas Energy, a Division of Southern Union )  
Company, Designed to Increase Rates for Natural )  
Gas Service to Customers in the Missouri Service )  
Area of the Company )

Case No. GR-2001-292

Missouri Public  
Service Commission

APPLICATION TO INTERVENE  
OF  
KANSAS CITY POWER & LIGHT COMPANY

COMES NOW Kansas City Power & Light Company ("KCPL"), pursuant to 4 CSR 240-2.075, and applies to intervene in the above-captioned matter and to become a party herein. In support thereof, KCPL states:

1. KCPL is a corporation duly organized and existing under the laws of the State of Missouri, with its principal office at 1201 Walnut Street, Kansas City, Missouri 64106. KCPL is an electrical corporation and public utility as defined in Section 386.020, RSMo Cumulative Supp. 1999, engaged in the generation, transmission, distribution and sale of electric energy and power in the states of Missouri and Kansas.

2. In this case, Missouri Gas Energy (MGE) seeks permission to increase its rates for gas service. KCPL is a gas customer of MGE and, therefore, KCPL will be directly impacted by MGE's proposed increase in its rates. In addition, KCPL's size, load factor and service characteristics are sufficiently different from other customers that its interests cannot be adequately represented by any other party.

3. Furthermore, KCPL's service territory overlaps MGE's and, therefore, KCPL competes with MGE for certain energy needs of common customers and prospective customers. The

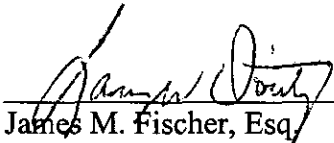
outcome of this proceeding may result in revisions to MGE's current rate structure which, if implemented, will alter the presently existing environment for competition for such customers, thus affecting KCPL's interests.

4. KCPL's interest in this proceeding is different from that of the general public, and KCPL may be adversely affected by a final order arising from this case. No other party can represent KCPL's interest in this proceeding, and KCPL's participation in this proceeding will promote the public interest.

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

WHEREFORE, Kansas City Power & Light Company prays that the Missouri Public Service Commission grant its Application to Intervene and allow it to become a party to these proceedings.

Respectfully submitted,

  
James M. Fischer, Esq. MBN 27543  
e-mail: [jfischer@aol.com](mailto:jfischer@aol.com)  
Larry W. Dority, Esq. MBN 25617  
e-mail: [lwdority@sprintmail.com](mailto:lwdority@sprintmail.com)  
FISCHER & DORITY, P.C.  
101 Madison Street, Suite 400  
Jefferson City, Missouri 65101  
Telephone: (573) 636-6758  
Facsimile: (573) 636-0383

Attorneys for Kansas City Power & Light Company

## CERTIFICATE OF SERVICE


I do hereby certify that a true and correct copy of the foregoing Application to Intervene has been hand-delivered or mailed, First Class mail, postage prepaid, this 28<sup>th</sup> day of November 2000, to:

Office of the Public Counsel  
P.O. Box 7800  
Jefferson City MO 65102

Gary W. Duffy  
Brydon, Swearengen & England, P.C.  
312 E. Capitol Avenue  
Jefferson City MO 65101

Robert J. Hack  
Missouri Gas Energy  
3420 Broadway  
Kansas City MO 64111

Dana K. Joyce, General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City MO 65102

  
Larry W. Dority