

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
JUN 27 2000

Missouri Public
Service Commission

In the matter of the Joint Applica-)
tion of UtiliCorp United Inc. and)
The Empire District Electric Compa-)
ny for authority to merge The Em-)
pire District Electric Company with)
and into UtiliCorp United Inc. and,)
in connection therewith, certain)
other related transactions.)

EM-2000-369

**ICI EXPLOSIVES USA, INC AND PRAXAIR, INC.
RESPONSE IN SUPPORT OF APPLICATION TO INTERVENE**

COME NOW Intervenors ICI EXPLOSIVES USA, INC. ("ICI")
and PRAXAIR INC. ("Praxair") and respond to the June 16, 2000
Application to Intervene submitted herein by Empire District
Electric Company Retired Employees ("Retired Employees") as
follows:

1. These intervenors support the aforesaid interven-
tion by Retired Employees.

2. The case is in a preliminary stage. Prior to
their requested intervention, only one round of testimony
(Applicants') had been submitted and the prehearing conference
has not yet been held. Proposed intervenors timely submitted
testimony concurrent with the other parties. Additional parties
at this point in time will not complicate nor affect the prepara-
tion by the Applicants, nor interfere with the presentation of
any other party's position.

3. No public notice has been given of the filings or
the content of the filings herein. Although these individuals

are now represented by counsel, there is no formal manner in which they would otherwise receive notice, perforce, notice of the content of the merger applications, as it would apply to affect their interests as retirees and pensioners of Empire District Electric Company.

4. Brief examination of the tendered testimony reveals that it is similar in content to what might otherwise be given in a public hearing, had such been held in this proceeding. Absent intervention, these individuals appear to have no other means of presenting their concerns to the Commission for its consideration.

5. It also appears that the concerns voiced by these individuals are germane to the matter before the Commission. Similar matters have been considered by the Commission in recent matters involving Missouri Gas Energy/Kansas Power & Light and in Western Resources/Kansas City Power & Light.

WHEREFORE, these intervenors pray that the Commission grant the requested intervention.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

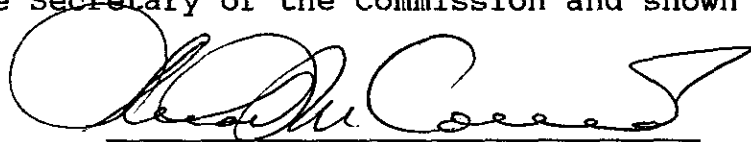


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ATTORNEYS FOR ICI EXPLOSIVES USA,
INC and PRAXAIR INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Application for Leave to Intervene by U.S. mail, postage prepaid addressed to all parties by their attorneys of record as provided by the Secretary of the Commission and shown on the sheet following.

A handwritten signature in dark ink, appearing to read "Stuart W. Conrad", is written over a horizontal line.

Stuart W. Conrad

Dated: June 29, 2000

Service Listing for EM-2000-369

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