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PLEASE REPLY TO MISSOURI OFFICE

January 14, 1987

RECEIVED

JAN 16 1987

MO. PUBLIC SERVICE COMMISSION

FILED
JAN 16 1987
PUBLIC SERVICE COMMISSION

Shogerty
Mr. Harvey G. Hubbs,
Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

RE: Case No. HO-86-139 In the matter of the
investigation of steam service rendered
by Kansas City Power & Light Company

Dear Mr. Hubbs:

Enclosed for filing in the above-captioned case is an original and fourteen copies of Intervenor's Motion for Public Hearings. Additionally, we have enclosed a copy that we would request that you file-stamp and return to us in the enclosed self-addressed and stamped envelope.

Copies of this pleading have been sent to all parties of record.

We appreciate your cooperation.

Very truly yours,

DIETRICH, DAVIS, DICUS, ROWLANDS,
SCHMITT & GORMAN

BY

Darry Gene Sands
Darry Gene Sands

DGS/bas
cc/All parties of record
Intervenor's

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

IN THE MATTER OF THE INVESTIGATION)
OF STEAM SERVICE RENDERED BY) Case No. HO-86-139
KANSAS CITY POWER & LIGHT COMPANY)

MOTION OF INTERVENORS FOR
LOCAL PUBLIC HEARINGS

Come now Boatmen's First National Bank of Kansas City, Kansas City Southern Industries, Inc., Cathedral of the Immaculate Conception, Denson One Hour Optical, Inc., The Ashley Building Partnership, Gailoyd Enterprises Corporation, John A. Marshall Co., Safety Federal Savings & Loan Association, MIMA Properties, Centerre Bank of Kansas City Missouri and Performing Arts Foundation/Folly Theatre, Inc., hereinafter "Intervenors", by and through their attorneys of record, and move that the Public Service Commission hold local public hearings in connection with KCP&L's steam heat conversion plan. In support of the Motion, Intervenors would suggest as follows:

Intervenors are eleven entities which have intervened in support of the KCP&L steam heat conversion plan. However, Intervenors represent only a small portion of the KCP&L steam heat customers within the affected area. Intervenors believe that local public hearings on the intervention issue could be beneficial to the Public Service Commission in terms of making its decision relative to the proposed steam heat conversion plan.

FILED

JAN 16 1987

PUBLIC SERVICE COMMISSION

The need for local public hearings is underscored by the fact that early in December the consultant retained by the Public Service Commission contacted certain steam customers in order to get input relative to the conversion plan. However, this group of customers, like the Intervenors, is a small group, and the Intervenors believe that more information could be adduced through local public hearings.


Although it is currently contemplated that written testimony is to be submitted by February 2, 1987, Intervenors see no reason that the proposed local public hearings could not be held subsequent to February 2, 1987. For that matter, although Intervenors would prefer to see the local public hearings held before the hearing scheduled for March 9, 1987, in that the proposed local public hearings are suggested to give the Public Service Commission additional community input, the local public hearings could be held after the currently scheduled hearing (March 9 through March 13, 1987).

For the foregoing reasons, the Intervenors respectfully request that the Public Service Commission schedule local public hearings as requested by Intervenors.

Respectfully submitted,

DIETRICH, DAVIS, DICUS, ROWLANDS,
SCHMITT & GORMAN

By


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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he mailed copies of the foregoing to the following parties by first-class mail, postage prepaid this 14th day of January, 1987: Mark G. English, Kansas City Power & Light Company, 1330 Baltimore Avenue, Kansas City, Missouri 64105, Mary Ann Young, Public Service Commission, P.O. Box 360, Jefferson City, Missouri 65102, David Claycomb, 2460 Pershing Road, Kansas City, Missouri 64108, Martin J. Bregman, 818 Kansas Avenue, Topeka, Kansas 66601, William Clark Kelly, Assistant Attorney General, P.O. Box 899, Jefferson City, Missouri 65102, David L. Schwaller, P.O. Box 809, Jefferson City, Missouri 65102, Carrol C. Kennett, Assistant City Attorney, 2800 City Hall, 414 East 12th Street, Kansas City, Missouri 64106, Jeremiah D. Finnegan, 4225 Baltimore, Kansas City, Missouri 64111, John B. Williams, County Counselor, Jackson County Courthouse, 415 East 12th Street, Kansas City, Missouri 64106, Office of Public Counsel, P.O. Box 7800, Jefferson City, Missouri 65102.