

**KPL
GAS
SERVICE**

LAW DEPARTMENT

THE KANSAS POWER AND LIGHT COMPANY

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August 16, 1989

NEXT DAY DELIVERY

Harvey Hubbs, Secretary
Missouri Public Service Commission
301 West High
Jefferson City, MO 65101

Re: KCPL - Case No. HM-90-4
Trigen - Case No. HA-90-5

Dear Mr. Hubbs:

Enclosed please find an original and fourteen copies of Applications for Leave to Intervene in the above cases, to be filed on behalf of The Kansas Power and Light Company.

Sincerely,


Michael C. Pendergast
Regulatory Affairs Attorney

MCP:jb
Enc.

xc: All Parties

FILED
AUG 17 1989
PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the application of)
Kansas City Power and Light Company)
for authority to sell its downtown)
Kansas City, Missouri, central station) Case No. HM-90-4
steam heat distribution system, and)
for the revocation of its certificate)
of public convenience and necessity to)
provide steam heat service.)

APPLICATION OF
THE KANSAS POWER AND LIGHT COMPANY
FOR LEAVE TO INTERVENE

COMES NOW The Kansas Power and Light Company (KPL) and,
pursuant to 4 C.S.R. 240.2.080 and 4 C.S.R. 240.2.110(11)-(13)
of the Commission's Rules and Regulations, requests leave to
intervene in the above-captioned proceeding. In support
thereof, KPL states as follows:

1. KPL is a local distribution company providing retail
natural gas service to consumers in Missouri, including
consumers located in the downtown area of Kansas City, Missouri.

2. Correspondence, orders, and other communications in
regard to this application and proceeding should be addressed
to:

Michael C. Pendergast
Regulatory Affairs Attorney
The Kansas Power and Light Company
818 Kansas Avenue
Topeka, KS 66612
(913) 296-8125

James R. Stuck
Director, Industrial Marketing
The Kansas Power and Light Company
818 Kansas Avenue
Topeka, KS 66612
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FILED
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3. On or about July 6, 1989, the Kansas City Power and Light Company (KCPL) filed an application with the Commission seeking authority to sell its steam system to Trigen-Kansas City District Energy Corporation (Trigen), and confirming the revocation of its public utility obligation to provide utility steam service as of the date of the sale. On the same date, Trigen also filed an application with the Commission requesting a certificate of public convenience and necessity to provide utility service in downtown Kansas City, Missouri, and for approval of its steam rates, rules, and regulations.

4. As a natural gas utility operating within the area which would be served by Trigen in the event the Commission were to approve the above-referenced applications, KPL has a direct interest in this proceeding. More specifically, to the extent Trigen intends to provide steam service as an alternative to natural gas services currently offered by KPL, it is clear that KPL has a substantial interest in the terms and conditions under which Trigen is to acquire the steam system from KCPL and use it to provide utility service in the downtown area.

5. KPL's interest in this proceeding is different from that of the general public and will not be adequately represented by any other party to this proceeding.

WHEREFORE, for the foregoing reasons, KPL respectfully requests that the Commission issue an Order granting KPL leave to intervene in this proceeding.

Respectfully submitted,

THE KANSAS POWER AND LIGHT COMPANY

By Michael C. Pendergast
Michael C. Pendergast
Regulatory Affairs Attorney
818 Kansas Avenue
Topeka, KS 66612
(913) 296-8125

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Application of The Kansas Power and Light Company for Leave to Intervene was deposited in the U.S. Mail, first class postage prepaid, this 16th day of August, 1989, addressed to all parties of record.

Janet E. Badsky
Janet E. Badsky