



ATTORNEY GENERAL OF MISSOURI

JEREMIAH W. (JAY) NIXON
ATTORNEY GENERAL

JEFFERSON CITY
65102

P.O. Box 899
(573) 751-3321

December 21, 1999

FILED²

DEC 21 1999

Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Public Service Commission
Truman State Office Building
Jefferson City, MO 65102

RE: *In the matter of Joint Application of UtiliCorp United, Inc. and
St. Joseph Light & Power Company for Authority to Merge*

Dear Sir/Madam:

Enclosed for filing please find an original and 15 copies of Motion to Consolidate.
Please stamp "filed" on the extra copy for my records. Thank you.

Sincerely,

JEREMIAH W. (JAY) NIXON
Attorney General

Shelley A. Woods/pah

SHELLEY A. WOODS
Assistant Attorney General

SAW:pah
Enclosure

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

FILED²

DEC 21 1999

Missouri Public
Service Commission
Case No. EM-2000-
292

In the Matter of the Joint Application of UtiliCorp)
United Inc. and St. Joseph Light & Power)
Company for Authority to Merge)
St. Joseph Light & Power Company with UtiliCorp)
United Inc. and, in Connection Therewith, Certain)
Other Related Transactions)

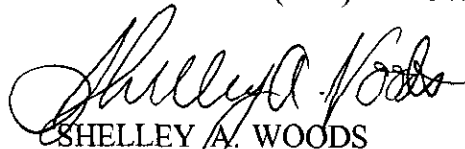
MOTION TO CONSOLIDATE

COME NOW Missouri Department of Natural Resources (MDNR) and pursuant to Rule 66.01, Supreme Court Rules of Civil Procedure, and for its Motion to Consolidate Case NO. EM-2000-292 and Case No. EM-2000-369, states that it joins in the Motion to Consolidate filed with this Commission by the Office of Public Counsel on December 17, 1999 and further joins in the suggested Procedural Schedule proposed by the Office of Public Counsel and the Commission's Staff.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that the Commission grant the Motion to Consolidate the two merger application cases.

Respectfully submitted,

JEREMIAH W. (JAY) NIXON


SHELLEY A. WOODS
Assistant Attorney General

MBE #33525
P. O. Box 899
Jefferson City, MO 65102

36

Telephone (573) 751-8795
TELEFAX No. (573) 751-8464

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid, by United States mail, this 21st day of December, 1999, to:

John Coffman
Office of Public Counsel
P.O. Box 7800
Jefferson City, Missouri 65102

James C. Swearengen/Paul A. Boudreau
Brydon, Swearengen & England, P.C.
P.O. Box 456
Jefferson City, Missouri 65102-0456

Karl Zobrist/Christine Egbarts
Blackwell Sanders Peper Martin LLP
Two Pershing Square, 2300 Main, Suite 1100
Kansas City, Missouri 64108

Gary L. Myers, Vice President, General Counsel
and Secretary
St. Joseph Light and Power Company
P.O. Box 998
St. Joseph, Missouri 64502

Stuart W. Conrad
Finnegan, Conrad & Peterson, L.C.
3100 Broadway, Suite 1209
Kansas City, MO 64111

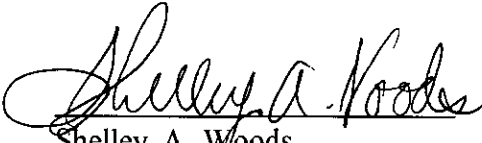
Steven Dottheim
Chief Deputy, General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Mark W. Comley
601 Monroc Street
Suite 301
Jefferson City, Missouri 65101

Jeffery A. Keevil

Stewart & Keevil, L.L.C.
1001 Cherry St.
Suite 302
Columbia, Missouri 65201-7931

William Nichoff
Ameren Services Company
1901 Chouteau, Box 149 (M/C 1310)
St. Louis, Missouri 63166


Shelley A. Woods