



ATTORNEY GENERAL OF MISSOURI

JEREMIAH W. (JAY) NIXON
ATTORNEY GENERAL

JEFFERSON CITY
65102

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

January 7, 2000

FILED

JAN 7 2000

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

Missouri Public
Service Commission


RE: *In the matter of Joint Application of UtiliCorp United, Inc. and
St. Joseph Light & Power Company for Authority to Merge*
Case No. EM-2000-369

Dear Sir/Madam:

Enclosed for filing please find an original and 15 copies of Application to Intervene in the above-styled matter. Please stamp "filed" on the extra copy for my records. Thank you.

Sincerely,

JEREMIAH W. (JAY) NIXON
Attorney General


SHELLEY A. WOODS
Assistant Attorney General

SAW:pah
Enclosure

FILED

JAN 7 2000

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

Missouri Public
Service Commission

In the Matter of the Joint Application of UtiliCorp)
United Inc. and Empire District Electric)
Company for Authority to Merge)
Empire District Electric Company with UtiliCorp)
United Inc. and, in Connection Therewith, Certain)
Other Related Transactions)

Case No. EM-2000-
369

APPLICATION TO INTERVENE

COME NOW Missouri Department of Natural Resources (MDNR) pursuant to 4 CSR 240-2.075 and respectfully moves this Commission to allow it to intervene in the above-styled matter. This application is made for the following reasons:

1. On December 15, 1999, UtiliCorp United Inc. and Empire District Electric Company filed their Joint Application seeking an order approving the merger of UtiliCorp United Inc. and Empire District Electric Company, and for other related relief.

2. The Energy Center, formerly the Division of Energy, MDNR, is a division of a state agency vested with the powers and duties set forth in § 640.150, RSMo.

3. The Energy Center, MDNR, has both an interest different than that of the general public, and its intervention will serve a public interest in that the Energy Center, MDNR, will be looking at the proposed merger from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. In particular, the Energy Center, MDNR, will look at the proposed merger to assess the commitment by Joint Applicants to provide low or no cost weatherization to low income families, the opportunities for energy efficiency services and alternatively-based electric energy. The Energy Center, MDNR review

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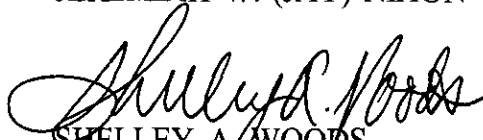
also will be in relation to the mandate set forth in § 640.150, RSMo. The mandate set forth in the statute includes planning for energy resource development; analyzing energy management issues; consulting and cooperating with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; assessing the potential impacts on environmental quality; and analyzing the potential for increased use of energy alternatives and making recommendations for the expanded use of such alternate energy sources and technologies.

4. The Energy Center has not come to any conclusion as to whether it supports or opposes the proposed merger at this time.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

JEREMIAH W. (JAY) NIXON


SHELLEY A. WOODS
Assistant Attorney General

MBE #33525
P. O. Box 899
Jefferson City, MO 65102
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 7th day of January, 2000, to:

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

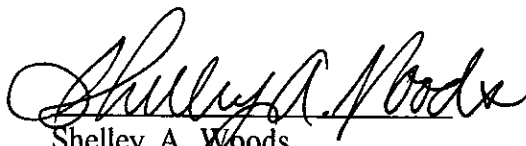
General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Mark W. Comley
601 Monroe 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 Niehoff
Ameren Services Company
1901 Chouteau, Box 149 (M/C 1310)
St. Louis, Missouri 63166



Shelley A. Woods