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March 16, 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

FILED³

MAR 19 2001

Missouri Public
Service Commission

Re: Case No. E0-2001-472

Dear Mr. Roberts:

Enclosed please find for filing the original and eight (8) copies of the Petition of IBEW Local 53 to Intervene in the above-captioned matter. Thank you for your attention to this matter.

Sincerely,

Charles R. Schwartz

CRS:sab
Enclosure

cc: L. Querry, IBEW Local 53

FILED³
MAR 19 2001

Missouri Public
Service Commission
-2001-472

Case No. EO-2001-472

PETITION OF IBEW LOCAL 53 TO INTERVENE

COMES NOW Local No. 53 of the International Brotherhood of Electrical Workers, AFL-CIO, (hereinafter "IBEW Local 53"), by and through counsel, and respectfully submit their Petition to Intervene in the above-captioned matter. In support of this Petition, and as grounds therefore, IBEW Local 53 states as follows:

1. IBEW Local 53 is a voluntary labor organization doing business and representing employees in Missouri;
2. The name, address, and telephone number of the petitioner seeking leave to intervene is:

Mr. Lyle K. Querry, Business Manager
I.B.E.W. Local 53
1100 Admiral Boulevard
Kansas City, Missouri 64106
Tel: (816) 421-5464

3. Petitioner requests that service be made to petitioner Lyle K. Querry of IBEW Local 53 and to petitioner's attorney listed herein;
4. IBEW Local 53 represents employees of contractors who provide services to UtiliCorp United Inc. These employees may be affected by any orders entered by the Commission in this proceeding, and IBEW Local 53 and its members are interested in this

proceeding. Because IBEW Local 53 and its members may be affected by the Commission's decision in this case, IBEW Local 53 has a direct interest in this proceeding that is different from that of the general public;

5. It is the position of IBEW Local 53 that the announced sale of certain of UtiliCorp United's operations will have an impact on wages, benefits, and terms and conditions of employment of members represented by the IBEW Local 53.

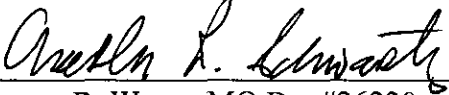
WHEREFORE, having stated the grounds for intervention, their position and interest in this proceeding, the International Brotherhood of Electrical Workers, Local No. 53 asks that the Commission;

- a. Grant IBEW Local 53 leave to intervene in this proceeding on its behalf and on behalf of its members and to be heard at such time as the Commission may fix; and
- b. In all respects be parties to this proceeding.

Dated this 16th day of March, 2001.

Respectfully submitted,

BLAKE & UHLIG, P.A.
475 New Brotherhood Bldg.
753 State Avenue
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Tel: (913) 321-8884
Fax: (913)


James R. Waers, MO Bar #26220
Charles R. Schwartz

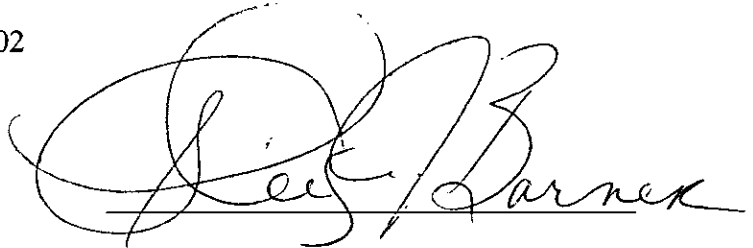
CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Petition to Intervene** was served upon all parties to this action, by causing the same to be deposited in the United States Mail, postage prepaid, this 16th day of March, 2001, addressed as follows:

David A. Meyer
Eric William Anderson
Associate General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Office of the Public Counsel
P.O. Box 7800
Jefferson City, Missouri

Gary W. Duffy
Brydon, Swearngen & England, P.C.
312 Capital Avenue
P.O. Box 456
Jefferson City, Missouri 65102

A handwritten signature in dark ink, appearing to read "Dick Barner", is written over a horizontal line.