



Kansas City Power & Light®

Law Department

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FILED⁴

September 19, 2002

SEP 20 2002

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street
P.O. Box 360
Jefferson City, MO 65101

Missouri Public
Service Commission

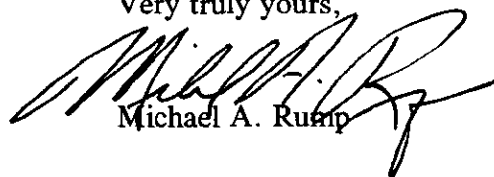
Re: Case No. EO-2003-0035 - In the Matter of the Application of the Application of Union Electric Company d/b/a AmerenUE for an Order Authorizing Applicant to Convey to and Lease Back from the City of Bowling Green, Missouri, Certain Real Property And Improvements and to Execute and Perform the Necessary Agreements under Section 100.010 Through 100.200 RSMo for the purpose of Construction of Applicant's Electric Generating Facility in Bowling Green, Missouri

Dear Mr. Roberts:

Enclosed for filing you will find the original and eight (8) copies of KCPL's Application to Intervene in the above-captioned matter.

Please bring this filing to the attention of the appropriate Commission personnel.

Very truly yours,


Michael A. Rump

c: Ronald Gieske
Office of Public Counsel
Dana K. Joyce, General Counsel
Lois Liehti

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Application of Union Electric)
Company d/b/a AmerenUE for an Order Authorizing)
Applicant to Convey to and Lease Back from the City)
Of Bowling Green, Missouri, Certain Real Property)
And Improvements and to Execute and Perform the)
Necessary Agreements under Section 100.010)
Through 100.200 RSMo for the Purpose of)
Construction Applicant's Electric Generating Facility)
In Bowling Green, Missouri)

Case No. EO-2003-0035

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**APPLICATION OF
KANSAS CITY POWER & LIGHT COMPANY
TO INTERVENE**

Missouri Public
Service Commission

COMES NOW Kansas City Power & Light Company ("KCPL"), pursuant to 4 CSR 240-2.075, et seq. and applies to intervene and to become a party herein. In support thereof, KCPL states:

1. KCPL is a corporation duly organized and existing under the laws of the State of Missouri, with its principal office at 1201 Walnut Street, Kansas City, Missouri, and is an electrical corporation and public utility as defined in Section 386.020, RSMo. KCPL is primarily engaged in the generation, transmission, distribution and sale of electric energy and power in western Missouri and eastern Kansas. KCPL provides electric service to approximately 230,000 residential customers and approximately 30,100 commercial and industrial customers in Missouri.

2. KCPL has filed with the Commission certified copies of its Articles of Incorporation and all amendments thereto and its Certificate of Good Standing. These documents are incorporated by reference.

3. All correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

Lois Liechti
Manager Regulatory Affairs
Kansas City Power & Light Company
1201 Walnut
Kansas City, Missouri 64106
(816) 556-2612
(816) 556-2110 (Facsimile)
lois.liechti@kcpl.com

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Kansas City Power & Light Company
1201 Walnut Street
Kansas City, Missouri 64106
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4. In this proceeding Union Electric Company (UE) has filed an application requesting authority to convey to and lease back from the City of Bowling Green, Missouri real property and improvements and to execute instruments necessary to construct an electric generating facility. KCPL is interconnected with UE's transmission system in Missouri and may be impacted by the construction of generation facilities. In addition, the construction of future KCPL generating facilities may be influenced by the Commission's decision on the sale and lease back transaction contemplated in this proceeding. As a result, KCPL has an interest in this proceeding that is different from that of the general public.

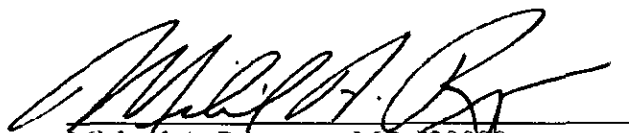
5. For the above-stated reasons, KCPL's interest in this proceeding is different from that of the general public and cannot be represented by any other party to these proceedings. Actions taken by the Commission in this proceeding may substantially affect KCPL's legal interests.

6. KCPL's participation will aid the Commission in resolving the issues raised in this proceeding. Consequently, KCPL's intervention and participation will promote the public interest.

7. Since there is insufficient information currently available to identify all issues that may arise which will affect KCPL's interests, KCPL reserves its right to state its position and participate with regard to any matter or issue arising in this proceeding.

WHEREFORE, KCPL respectfully requests that the Commission issue an order authorizing it to intervene in the above-captioned matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Michael A. Rump', is written over a horizontal line.

Michael A. Rump MO #39080
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ATTORNEY FOR KANSAS CITY
POWER & LIGHT COMPANY

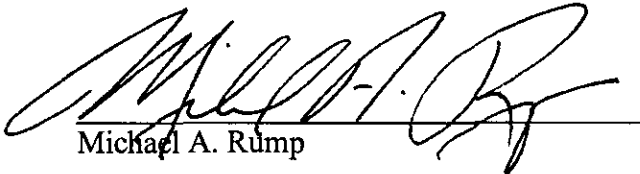
CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, postage prepaid, this 19TH day of September, 2002, to:

Ronald Gieske
AmerenUE
One Ameren Plaza
10901 Chouteau
P.O. Box 66149
St. Louis, MO 63166-6149

Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

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


Michael A. Rump