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November 12, 1999

FILED²

NOV 12 1999

Public Service Commission
Truman State Office Building
Jefferson City, MO 65102

Missouri Public
Service Commission

EM-2000-292

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 Application to Intervene. Please stamp "filed" on the extra copy for my records. Thank you.

Sincerely,

JEREMIAH W. (JAY) NIXON
Attorney General

Shelley Woods/pah

SHELLEY A. WOODS
Assistant Attorney General

SAW:pah
Enclosure

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

FILED²

NOV 12 1999

**Missouri Public
Service Commission**

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)

Case No. EM-2000-
292

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 October 19, 1999, UtiliCorp United Inc. and St. Joseph Light & Power Company filed their Joint Application seeking an order approving the merger of UtiliCorp United Inc. and St. Joseph Light & Power Company, and for other related relief.

2. 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 Division of Energy, MDNR, has both an interest different than that of the general public, and its intervention will serve a public interest in that the Division of Energy, 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 Division of Energy, 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 Division of Energy,

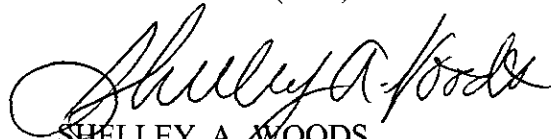
MDNR review also will be in relation to the mandate set forth in § 640.150, RSMo. The mandate set forth in the statute includes planning for energy resource development; analyzing energy management issues; consulting and cooperating with all state and federal governmental agencies on matters of energy 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 Division of Energy 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


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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid, by United States mail, this 27th day of November, 1999, to:

Office of Public Safety
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Jefferson City, Missouri 65102

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