

LATHROP GAGE

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February 29, 2000

HAND DELIVERED

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Room 530
Truman State Office Building
Jefferson City Missouri 65101

FILED²
FEB 29 2000
Missouri Public
Service Commission

Re: **GST Steel Company v. Kansas City Power & Light Company**
Case No. EC99-553

Dear Secretary Roberts:

Enclosed for filing in the above-referenced case please find an original and fourteen copies of **GST Steel Company's Motion to Amend by Interlineation the First Page of the Petition for an Investigation as to the Adequacy of Service Provided by the Kansas City Power & Light Company and Request for Immediate Relief.**

Also enclosed are copies of the first page of the petition reflecting the amended revisions to replace the corresponding public and sealed pages on file with the Commission.

Thank you in advance for your attention to this matter.

Sincerely,

LATHROP & GAGE L.C.

By:


Kurt U. Schaefer

KUS/jf
Enclosures
cc: All Parties of Record

1108.1

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

FEB 29 2000

Missouri Public
Service Commission

In the Matter of Hawthorn Generating)
Station Unit No. 5 and the Adequacy)
of Service Provided by the)
Kansas City Power & Light Company)

Case No. EC-99-553

**PETITION FOR AN INVESTIGATION AS TO THE
ADEQUACY OF SERVICE PROVIDED BY THE KANSAS CITY POWER
& LIGHT COMPANY AND REQUEST FOR IMMEDIATE RELIEF**

COMES NOW GS Technologies Operating Co., Inc., doing business in Missouri as GST Steel Company ("GST") and hereby requests that the Public Service Commission of the State of Missouri (the "Commission") take action to assure that GST receives adequate service pursuant to Section 393.130.1, RSMo., and that the rates GST pays are just and reasonable in accordance with Section 393.130.1, RSMo. In support of its Petition and Request, GST states as follows:

I. INTRODUCTION

A. Background on GST

1. GS Technologies Operating Co., Inc., is corporation duly authorized to conduct business in the State of Missouri. It conducts business in Missouri under the duly registered name of GST Steel Company ("GST"), and its principal place of business is located at 7000 Roberts Road, Kansas City, Missouri 64125. GST operates a steel manufacturing facility that produces grinding balls and rods for the mining industry, as well as carbon wire rods. In its manufacturing process, GST utilizes electric arc furnaces, which consume extremely large amounts of electric energy. GST is the largest single point retail customer on Kansas City Power & Light Company's ("KCPL") system, using in excess of half a billion kilowatt-hours of electricity every year, at a cost of millions of dollars. Consequently, electricity comprises one of GST's largest variable costs of producing steel, and as such is of critical importance to GST's ability to compete.