FINNEGAN, CONRAD & PETERSON, L.C.

ATTORNEYS AND COUNSELORS AT LAW

1209 PENNTOWER OFFICE CENTER 3100 BROADWAY KANSAS CITY, MISSOURI 64111

i

(816) 753-1122 TELECOPIER (816) 756-0373 JEREMIAH PINNEGAN, P.C. STUART W. CONRAD C. EDWARD PETERSON⁴

*ALSO ADMITTED IN KANSAS AND MASSACHUSETTS

January 20, 2000

FEDERAL EXPRESS

Mr. Dale H. Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 301 West High R530 Jefferson City, Missouri 65102 FILED

JAN 2 1 2000

Missouri Public Service Commission

Re: UtiliCorp United and St. Joseph Light & Power Proposed Merger Missouri PSC Case No. EM-2000-292

Dear Mr. Roberts:

Enclosed are the original and fourteen (14) conformed copies of a pleading, which please file in the above matter and call to the attention of the Commission.

An additional copy of the **INITIAL PAGE** of the material to be filed is enclosed, which kindly mark as received and return to me in the enclosed envelope as proof of filing.

Thank you for your attention to this important matter. If you have any questions, please call.

Sincerely yours,

CONRAD & PETERSON, L.C. FINNEGAN, Stuart W. Conrad

SWC:s Enclosures cc: All Parties

F:\DOCS\SWC\19344.1

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

)

)

)

)

ì

)

)

FILED

JAN 2 1 2000

Missouri Public S**ervice Commissio**n

In re the Joint Application of UtiliCorp United, Inc. and St. Joseph Light & Power Company for authority to merge St. Joseph Light & Power Company with and into UtiliCorp United Inc. and, in connection therewith, certain other related transactions.

Case No. EM-2000-292

COMES NOW Intervenor Ag Processing Inc. a Cooperative (AGP) and responds to Public Counsel's Motion to Consolidate and to Joint Applicant's Proposed Procedural Schedule as follows:

1. AGP supports Public Counsel's Motion to Consoli-

date.

2. The procedural schedule for the consolidated cases should be as proposed by Intervenors ICI EXPLOSIVES USA INC. and PRAXAIR INC. in the matter of the proposed merger of UtiliCorp United Inc. and Empire District Electric Company, EM-2000-369.

42930.1

÷.

WHEREFORE Intervenor AGP prays that the Commission approve Public Counsel's Motion to Consolidate and that the above-referenced procedural schedule be approved.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C. Stuart W. Conrad Mo. Bar #23966

3100 Broadway, Suite 1209 Kansas City, Missouri 64111 (816) 753-1122 Facsimile (816)756-0373 Internet: stucon@fcplaw.com

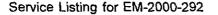
ATTORNEYS FOR AG PROCESSING INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Application for Leave to Intervene by U.S. mail, postage prepaid addressed to all parties by their attorneys of record as provided by the Secretary of the Commission and shown on the sheet following.

Stuart W. Conrad

Dated: January 21, 2000



Mr. Paul A. Boudreau Attorney Brydon, Swearengen & England, P.C. 312 East Capitol Avenue P. O. Box 456 Jefferson City, MO 65102-0456

Ms. Christine Egbarts Attorney Blackwell Sanders Peper Martin LLP Two Pershing Square 2300 Main, Suite 1100 Kansas City, MO 64108

Mr. Gary L. Meyers Vice President, General Counsel St. Joseph Light & Power Co. P. O. Box 998 St. Joseph, MO 64502

Mr. James C. Swearengen Brydon, Swearengen & England, P.C. 312 East Capitol Avenue P. O. Box 456 Jefferson City, MO 65102-0456 Mr. Mark W. Comley Attorney Newman, Comley & Ruth 601 Monroe Street, Suite 301 P.O. Box 537 Jefferson City, MO 65102-0537

Mr. Dan Joyce General Counsel Missouri Public Service Commission Truman Office Building - R530 P. O. Box 360 301 West High - P.O. Box 360 Jefferson City, MO 65102-0360

Mr. Douglas E. Micheel Senior Public Counsel Office of the Public Counsel P. O. Box 7800 Jefferson City, MO 65102

Mr. Karl Zobrist Attorney Blackwell Sanders Peper Martin LLP Two Pershing Square 2300 Main, Suite 1100 Kansas City, MO 64108