

FINNEGAN, CONRAD & PETERSON, L.C.

ATTORNEYS AND COUNSELORS AT LAW

1209 PENNTOWER OFFICE CENTER
3100 BROADWAY
KANSAS CITY, MISSOURI 64111

(816) 753-1122
TELECOPIER (816) 756-0373

JEREMIAH FINNEGAN, P.C.
STUART W. CONRAD
C. EDWARD PETERSON*

*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 21 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,

FINNEGAN, CONRAD & PETERSON, L.C.

By: 

Stuart W. Conrad

SWC:s
Enclosures
cc: All Parties

F:\DOCS\SWC\19344.1

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

JAN 21 2000

Missouri Public
Service Commission

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 con-)
nection therewith, certain other)
related transactions.)

Case No. EM-2000-292

RESPONSE OF INTERVENOR AG PROCESSING INC TO PUBLIC COUNSEL
MOTION TO CONSOLIDATE

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 Intervenor 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.

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

Service Listing for EM-2000-292

Mr. Paul A. Boudreau
Attorney
Brydon, Swearngen & 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. Swearngen
Brydon, Swearngen & 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