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July 8, 2000

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

FILED

JUL 12 2000

**Missouri Public
Service Commission**


Re: EM-2000-369

Dear Mr. Roberts:

Enclosed please find for filing in the above-captioned case the original and eight (8) copies of the IBEW Local 1474's Response In Support Of Application To Intervene. Copies have been mailed to all counsel of record.

Thank you for your attention to this matter.

Very truly yours,


William A. Jolley

WAJ:ce
Enclosures

cc: Counsel of Record

FILED

BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION

JUL 12 2000

Missouri Public
Service Commission

In the Matter of The Joint Application Of)
UtiliCorp United Inc. and The Empire District)
Electric Company For Authority To Merge The)
Empire District Electric Company With And Into)
UtiliCorp United Inc., And, In Connection)
Therewith, Certain Other Related Transactions.)

Case No. EM-2000-369

**INTERVENOR IBEW LOCAL 1474'S RESPONSE IN SUPPORT OF
APPLICATION TO INTERVENE**

COMES NOW, Intervenor International Brotherhood of Electrical Workers, Local 1474 ("Union" or "IBEW Local 1474") by and through counsel of record, and, in response to the June 16, 2000 application to intervene, submitted on behalf of Albert Fuchs, et al.

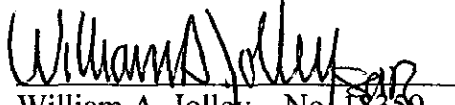
("Retired Empire Employees") hereby states as follows:

1. Intervenor IBEW Local 1474 supports the intervention by the retired Empire employees.
2. The interest that the retired Empire employees have in their retirement benefits is "an interest which is different from that of the general public" and an interest different from that represented by Intervenor IBEW Local 1474 and other parties. We agree, as applicants have stated, that their interest in their retirement benefits could be significantly affected if the proposed merger is approved. Although Public Counsel has raised an issue regarding retirement benefits in its prepared rebuttal testimony, the interests of the retired Empire employees can not be exclusively represented by any other party. These individuals are particularly suited to represent their concerns to the Commission.
3. Granting the application to intervene would cause no hardship or prejudice to

the joint applicants or to any other party.

WHEREFORE, Intervenor IBEW Local 1474 prays that the Commission grant the requested intervention.

Respectfully submitted,


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ATTORNEY FOR INTERVENOR
INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS, LOCAL
UNION NO. 1474

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid, by United States mail, this 8th day of July, 2000.



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