

JEREMIAH D. FINNEGAN
HUGH F. O'DONNELL III
ATTORNEYS AT LAW

4225 BALTIMORE
KANSAS CITY, MISSOURI 64111
(816) 753-1122

September 23, 1986

Mr. Harvey G. Hubbs
Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Re: Case No. HO-86-139; Kansas City Power & Light Company

Dear Mr. Hubbs:

Enclosed please find an original and 15 copies of an Application for Intervention for filing in the above-captioned cause.

Very truly yours,


Jeremiah D. Finnegan

JDFljt

Enclosures

FILED

SEP 24 1986

PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the investigation)
of steam service rendered by Kansas) Case No. HO-86-139
City Power and Light Company.)

APPLICATION FOR INTERVENTION

COMES NOW the County of Jackson, Missouri, Applicant, and applies for leave to intervene pursuant to 4CSR240-2.110 of the Commission Rules of Practice and Procedure, and states as follows:

1. The County of Jackson, Missouri is a political subdivision of the State of Missouri. It is seeking leave to intervene as a steam heat customer and in a representative capacity on behalf of all steam heat customers located in Jackson County, Missouri.

2. That copies of all Notices, Orders and correspondence in this proceeding be mailed to the following addresses:

Jeremiah D. Finnegan, Esq.
4225 Baltimore
Kansas City, Missouri 64111

John B. Williams
County Counselor
Jackson County Courthouse
415 E. 12th Street
Kansas City, Missouri 64106

FILED

SEP 24 1986

PUBLIC SERVICE COMMISSION

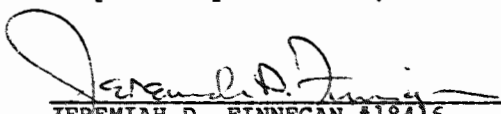
3. That said applicant has been advised that Kansas City Power & Light Company (KCP&L) has filed proposed tariffs: 1) seeking a 120% increase in its steam rates, effective January 1, 1987; 2) an alternative phase-in schedule of steam rates; 3) a conversion schedule to discontinue providing steam service; and 4) revised general rules and regulations.

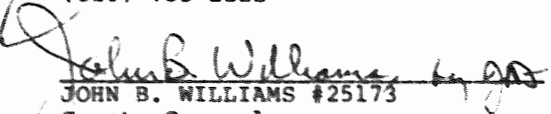
4. That applicant seeks leave to intervene in this case

for the purpose of opposing any unjust or unreasonable increase in steam rates to KCP&L's steam heat customers and in opposition to the steam conversion plan.

WHEREFORE, applicant respectfully prays that the Commission grant its intervention and to allow such applicant to fully participate in these proceedings in opposition to any unjust or unreasonable increase in steam rates to the steam heat customers, the discontinuance of steam service and for all other purposes.

Respectfully submitted,


JEREMIAH D. FINNEGAN #18416
4225 Baltimore
Kansas City, Missouri 64111
(816) 753-1122


JOHN B. WILLIAMS #25173
County Counselor
Jackson County Courthouse
415 E. 12th Street
Kansas City, Missouri 64106
(816) 881-3355

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Application for Intervention was mailed, postage prepaid, this 23rd day of September, 1986 to all parties of record.


JEREMIAH D. FINNEGAN

LEO EISENBERG CO.

A COMPLETE REAL ESTATE SERVICE...SINCE 1938

September 23, 1986

The Commission
P.O. Box 360
Jefferson City, Missouri 65102

RE: In The Matter of, And In The Interest of Steam Service
Rendered By Kansas City Power and Light Under Docket
Number HO-86139

To Whom It May Concern:

This letter is being sent to The Commission to inform them that CBC Investment Company, the owner of Boatmen's Center, at 920 Main Street, Kansas City, Missouri 64105, wishes to intervene and participate in the above referenced proceedings. At the present time we have not taken a stand in favor of or against KCPL's proposal. Our main concern is the requested rate increase for the steam service and as to why we have to remain a steam service customer versus an electric rate customer under the proposal by Kansas City Power and Light.

If you need any further information from our company, please contact me at (816) 221-1802.

Sincerely,

LEO EISENBERG CO.


Randall J. Jensen
Asset Manager

RJJ:adc

FILED

SEP 24 1986

PUBLIC SERVICE COMMISSION

*Called for correct
filing 9-24-86*

350 Westgate Tower • 1121 Walnut • Kansas City, Missouri 64108 • (816) 221-6000

International Council of Shopping Centers • Certified Commercial Investment Broker • National Appraisal Marketing Institute • Certified Property Manager
Certified Shopping Center Manager • Associated Management Organizations • Institute of Real Estate Managers • Building Owners and Managers Association
Real Estate Board of Kansas City, Missouri • National Association of Real Estate Boards • American Chapter of International Real Estate Federation

KANSAS CITY POWER & LIGHT COMPANY

1330 BALTIMORE AVENUE

KANSAS CITY, MISSOURI 64105

LAW DEPARTMENT
(816) 536-2755

September 26, 1986

File No. 0501-86

FILED

SEP 26 1986

PUBLIC SERVICE COMMISSION

Mr. Harvey G. Hubbs, Secretary
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102

RE: Case No. HO-86-139;
Kansas City Power & Light Company

Dear Mr. Hubbs:

Enclosed for filing are the original and fourteen copies of KCPL's initial filing in this matter. Although the Commission's August 25, 1986 Order established a date of October 4 for this filing, KCPL has filed before this date to allow the parties and applicants for intervention time to review this filing before the October 1 early prehearing conference. Also enclosed for filing are the original and fourteen copies of KCPL's Recommendation concerning test year and true-up.

Copies of these filings have been served upon the Staff, Public Counsel and all applicants for intervention on this date.

Very truly yours,


Mark G. English

MGE:cb

Enc.

cc w/enc.: Parties of Record
Applicants for Intervention