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December 11, 1986

Daniel J. Redel  
Acting Secretary  
Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Re: Investigation of the Revenue Effects Upon  
Missouri Utilities of the Tax Reform Act of 1986  
Docket No. AO-87-48

Dear Mr. Redel:

I enclose herewith an original and fourteen (14) copies of separate intervention applications of Anheuser-Busch, Inc. and Monsanto Company, et al., and will appreciate your bringing these filings to the attention of the Commission.

Extra copies of these Applications are enclosed, and I would appreciate your file stamping them and returning them to the undersigned. By copies of this letter and enclosures to the indicated utilities, I request that each utility send to this office two copies of all reports and all related work papers filed with the Commission pursuant to the Commission's Order entered in this docket on November 3, 1986.

Yours very truly,

*Robert C. Johnson*  
Robert C. Johnson

cs  
Enclosures (32)  
cc/enc: W. R. England, III  
A. Drue Jennings  
John Rosenberg  
cc/encs(2): Paul Agathen  
Richard French  
William C. Harrelson  
Gerald T. McNeive, Jr.

**FILED**  
DEC 12 1986  
PUBLIC SERVICE COMMISSION

**RECEIVED**  
DEC 12 1986  
MO. PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the matter of the )  
investigation of the revenue ) Docket No. AO-87-48  
effects upon Missouri utilities of)  
the Tax Reform Act of 1986. )

APPLICATION FOR INTERVENTION

Come now General Motors Corporation, Monsanto Company, PPG Industries, Inc., and Union Carbide Corporation by their attorneys, and pursuant to Rule 4CSR240-2.110 of the Commission ask leave to intervene in this proceeding. In support of said Application and as grounds therefor, Applicants state as follows:

1. Applicants herein respectively own and operate large industrial plants within the state of Missouri and by reason thereof are substantial purchasers of (i) electric energy from Union Electric Company of St. Louis, Missouri, Kansas City Power & Light Company, Kansas City, Missouri, and Empire District Electric Company and (ii) natural gas from Laclede Gas Company and Kansas Power & Light Company (formerly Gas Service Company).

2. This proceeding involves the impact on Missouri utilities of the recently enacted Tax Reform Act of 1986. A preliminary review of the Act indicates that its implementation will result in a change in revenue requirements for some or all of these utilities. A change in revenue requirement of necessity involves rate design issues. These changes can affect the cost of utility service of Applicants and may be discriminatory. Applicants therefor have a direct interest in this proceeding.

FILED

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PUBLIC SERVICE COMMISSION

3. It is the position of Applicants that appropriate procedures should be initiated so that any reduction in revenue requirement of the respective utilities as determined by this Commission herein or in any related proceeding may be promptly reflected in reduced rates determined on an appropriate cost of service basis.

4. Counsel for these Applicants has contacted counsel for the Commission Staff and the Office of Public Counsel and notified them that Applicants will seek to intervene herein. Each has orally advised that he has no objection to such intervention.

WHEREFORE, having stated grounds for intervention, the position and interest of these Applicants in the proceeding, said Applicants ask that the Public Service Commission of the state of Missouri:

(a) grant the Applicants leave to intervene in this proceeding and to be heard with respect to this Application; and

(b) grant the within Application and thereby entitle said Applicants to have notice of and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on the argument, and in all other respects to be made a party to these proceedings.

DATED at St. Louis, Missouri, this 11th day of December, 1986.



Robert C. Johnson, #15755  
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and HETLAGE  
720 Olive Street, 24th Floor  
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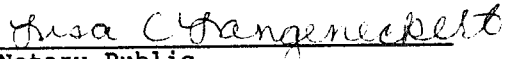
Attorney for Applicants

STATE OF MISSOURI    )  
                              )SS  
CITY OF ST. LOUIS    )

Robert C. Johnson, being first duly sworn, on his oath and in his capacity as counsel for the within Applicants for intervention, states that he has knowledge of the matters stated in this Application for Intervention and that said matters are true to the best of his knowledge, information, and belief.

  
Robert C. Johnson

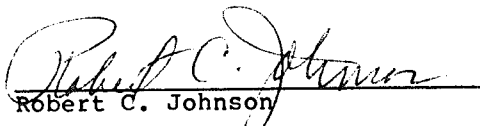
Subscribed and sworn to before me this 11<sup>th</sup> day of December, 1986.

  
Notary Public

MISSOURI PUBLIC SERVICE COMMISSION  
BY ORDER OF THE COMMISSIONER  
CITY OF ST. LOUIS

CERTIFICATE OF SERVICE

Robert C. Johnson, an attorney of record for Applicants herein, hereby certifies that the foregoing Application for Intervention has been duly served upon the Staff of the Missouri Public Service Commission, the Office of Public Counsel, Empire District Electric Company, Kansas Power & Light Company, Laclede Gas Company, and Union Electric Company by mailing by first class mail, to each such party, a copy thereof, in properly addressed envelopes, with charges prepaid, on this 11<sup>th</sup> day of December, 1986.

  
Robert C. Johnson