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OF COUNSEL

January 10, 2000

FILED

JAN 12 2000

Missouri Public
Service Commission

Hon. Dale Hardy Roberts
Secretary and Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Re: 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)

Dear Mr. Roberts:

Please find enclosed for filing the original and 14 copies of an Application to Intervene in the above-referenced cause on behalf of International Brotherhood of Electrical Workers, Local Union No. 1474. I have attached a copy of this cover letter to all parties and counsel listed on the Certificate of Service of the Application to Intervene.

I would appreciate it if you would return to me a file-stamped copy of the Application to Intervene, or other record of its filing, and have enclosed an additional copy for that purpose.

Thank you for your assistance.

Sincerely,


William A. Jolley

WAJ/dt
Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

JAN 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

**APPLICATION TO INTERNATIONAL BROTHERHOOD OF ELECTRICAL
WORKERS LOCAL UNION NO. 1474 TO INTERVENE**

Comes now International Brotherhood of Electrical Workers, Local Union No. 1474 ("Local 1474"), and in support of its Application to Intervene respectfully states as follows:

1. Local 1474 is a labor organization as defined in the National Labor Relations Act, as amended, 29 U.S.C. Section 152, *et seq.* Local 1474 represents certain employees of Empire District Electric Company ("Empire"), and has a collective bargaining agreement with Empire covering the employees it represents.
2. The Empire employees represented by Local 1474 may, and are likely to, be affected by orders entered by the Commission in this proceeding and, accordingly, Local 1474 and the employees it represents are interested in this proceeding.
3. Because Local 1474 and the employees it represents may, and are likely to, be directly affected by the Commission's decisions and orders in this case, Local 1474 and the employees it represents have a direct interest in this proceeding which is different from that of the general public, and which cannot be adequately represented by any other party. Furthermore, granting the proposed intervention will serve the public interest because it will ensure that the rights of the employees represented by Local 1474 are adequately protected.

4. While Local 1474 does not currently have sufficient information to support or oppose the proposed merger between Empire and UtiliCorp United Inc., Local 1474 is concerned that decisions or orders of the Commission herein could adversely affect the wages, benefits, work opportunities, safety and other terms and conditions of employment of the Empire employees represented by Local 1474.

5. In its Order and Notice dated December 16, 1999, the Commission set an intervention date for this case of January 14, 2000. Local 1474 submits that it meets the criteria for intervention set forth in 4 CSR 240-2.075 and, accordingly, that its Application to Intervene should be granted.

6. The full name and address of Local 1474 is as follows:

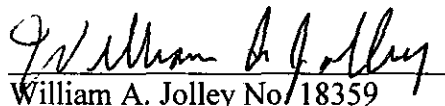
IBEW Local Union No. 1474
Bill Courtney, President and Business Manager
14489 C.R. 130
Carthage, Missouri 64836
Tel: (877) 359-9734
Fax: (877) 359-9734

7. Local 1474 requests that service of all pleadings, correspondence, communications and orders and decisions of the Commission be made to Local 1474 at the address shown in paragraph 6 above and to counsel as follows:

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WHEREFORE, having stated its grounds for intervention, Local 1474 moves that the Commission enter an order granting it leave to intervene as a full party in this case in its behalf and on behalf of the employees it represents.

Respectfully submitted,



William A. Jolley No. 18359

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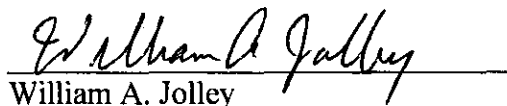
Tel: (816) 561-3755

Fax: (816) 561-9355

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

CERTIFICATE OF SERVICE

I hereby certify that, in addition to the original and 14 copies filed with the Secretary of the Commission, copies of the foregoing Application to Intervene have been served upon Counsel for Empire District Electric Company, Counsel for UtiliCorp United Inc., President and Chief Operating Officer of Empire District Electric Company, President and Chief Operating Officer of UtiliCorp United Inc., and office of the Public Counsel by depositing same in the U.S. Mail, first class delivery, on this 10th day of January, 2000.



William A. Jolley