

**KPL  
GAS  
SERVICE**

LAW DEPARTMENT

THE KANSAS POWER AND LIGHT COMPANY

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MO. PUBLIC SERVICE COM.

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TOPEKA, KANSAS 66601  
(913) 296-6562

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(913) 296-6429

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September 12, 1986

Hon. Harvey Hubbs, Secretary  
Missouri Public Service Commission  
P. O. Box 360  
Truman Building - 301 West High Street  
Jefferson City, Missouri 65101

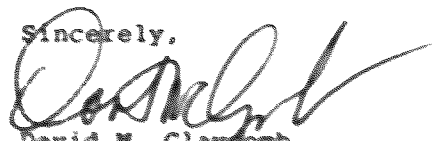
Re: Case No. HO-86-139

Dear Mr. Hubbs:

Enclosed for filing in the above-referenced case is the original and fifteen copies of The Kansas Power and Light Company's Application to Intervene.

Please have the extra copy stamped as "filed" and returned to me in the enclosed self-addressed envelope.

Sincerely,



David M. Claycomb  
Director, Legal Services  
and Administration

DMC:mj  
Enclosures

cc: All parties of record

**FILED**  
SEP 15 1986  
MO. PUBLIC SERVICE COM.

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the matter of the investigation)  
of steam service rendered by        )  
Kansas City Power & Light Company )

CASE NO. HO-86-139

THE KANSAS POWER AND LIGHT COMPANY'S  
APPLICATION TO INTERVENE

Comes now The Kansas Power and Light Company (KPL) pursuant to 4 CSR 240-2.110(12) and applies to intervene herein and to become a party for all purposes in the above-captioned matter, and in support thereof respectfully states:

1. KPL is a corporation organized and existing under the laws of the state of Kansas with its principal office located in Topeka, Kansas. In Missouri KPL is a public utility engaged in the sale and distribution of natural gas for domestic, commercial, and industrial use to approximately 400,000 customers.

2. The Kansas City Power & Light Company has filed its application for authority to alter its tariffs and to increase rates for steam service provided to customers in the Missouri service area of the Company.

3. Action by the Commission on the application of Kansas City Power & Light Company will or may adversely affect both KPL and its customers. Kansas City Power & Light Company's suggested tariffs may be inequitable, inefficient, unjust, unreasonable, unduly preferential, and unjustly discriminatory.

4. The interest of KPL in the subject matter of this proceeding is different from that of the general public, cannot

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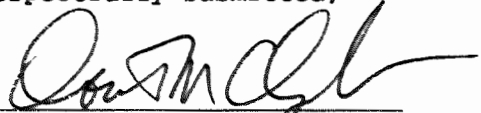
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be adequately represented by any other party to this proceeding and the approval of its intervention would serve the public interest. Good cause exists for allowing intervention, and failure to allow intervention will or may prejudice the interest of KPL and its customers.

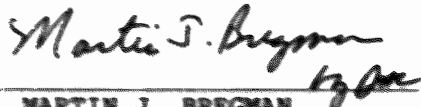
WHEREFORE, having stated the grounds for intervention and its interest in this proceeding, KPL requests that the Commission enter its order granting KPL's intervention herein.

Dated at Kansas City, Missouri on this 12<sup>th</sup> day of September, 1986.

Respectfully submitted,



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Attorneys for  
THE KANSAS POWER AND LIGHT CO.

STATE OF MISSOURI     )  
                              ) ss.  
COUNTY OF JACKSON    )

David M. Claycomb, being first duly sworn, on his oath and in his capacity as Director, Legal Services and Administration for The Kansas Power and Light Company, states that he: (1) is authorized to execute on behalf of The Kansas Power and Light Company this Application for Intervene; and (2) has knowledge of the matters stated in this Application to Intervene, and that said matters are true to the best of his knowledge, information, and belief.

  
\_\_\_\_\_  
DAVID M. CLAYCOMB


Subscribed and sworn to before me this 12<sup>th</sup> day of September, 1986.

MARGUERITE M. JENKINS  
Notary Public - State of Missouri  
Commissioned in Jackson County  
My Commission Expires Sept. 9, 1990

  
\_\_\_\_\_  
NOTARY PUBLIC

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing "The Kansas Power and Light Company's Application to Intervene" was mailed, postage prepaid, this 12<sup>th</sup> day of September, 1986 to: Mark G. English, Kansas City Power & Light Company, 1330 Baltimore Avenue, Kansas City, Missouri, 64105; Bernard J. Beaudoin, The Kansas City Power & Light Company, 1330 Baltimore, Kansas City, Missouri, 64105; and Office of Public Counsel, P. O. Box 7800, Jefferson City, Missouri, 65102.

  
\_\_\_\_\_  
DAVID M. CLAYCOMB