



SEP 18 1986
MO. PUBLIC SERVICE COM. DIV.

ATTORNEY GENERAL OF MISSOURI

JEFFERSON CITY

65102

WILLIAM L. WEBSTER
ATTORNEY GENERAL

P. O. Box 899
(314) 751-3321

September 17, 1986

Harvey G. Hubbs
Secretary
Public Service Commission
Post Office Box 360
Jefferson City, Missouri 65102

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

Dear Mr. Hubbs:

Enclosed are the original and fourteen (14) copies of the State of Missouri's Application to Intervene for filing in this case.

A copy of the Application to Intervene has been mailed this date to the Company's attorney, Mark G. English, Post Office Box 679, Kansas City, Missouri, 64141.

Very truly yours,

WILLIAM L. WEBSTER
Attorney General

Tom Clark Kelly
Mr. Clark Kelly
Assistant Attorney General

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Enclosures

FILED

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PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE COMMISSION

Case No. HO-86-139

APPLICATION TO INTERVENE

The State of Missouri, at the relation of William L. Webster, Attorney General, upon information of John A. Pelzer, Commissioner, Office of Administration, submits this application to intervene in the above-captioned matter, and in support thereof states:

1. William L. Webster is the duly elected Attorney General of the State of Missouri and, as such, is authorized by law to appear and interplead on behalf of the State of Missouri in any proceeding or tribunal in which the state's interests may be involved.

2. The Office of Administration is the department within the state government of Missouri which is responsible for contracting for the provision of steam service to state-owned premises located in Kansas City, Missouri.

3. Kansas City Power & Light Company provides steam service to state-owned premises located within the Company's steam service area, by reason of which the State of Missouri has an interest in the outcome of this proceeding which is different from that of the general public. This applicant has not finally

determined its position regarding the proposed tariffs submitted by the Company.


4. If this application to intervene is granted, the State of Missouri requests that a copy of each document filed by any party to this proceeding be mailed or delivered to the following persons:

Wm. Clark Kelly
Assistant Attorney General
Post Office Box 899
Jefferson City, Missouri 65102

David L. Schwaller
Post Office Box 809
Jefferson City, Missouri 65102

WHEREFORE, the State of Missouri requests the Commission to grant this application to intervene.

WILLIAM L. WEBSTER
Attorney General


Wm. Clark Kelly
Assistant Attorney General

Post Office Box 899
Jefferson City, Missouri 65102
(314) 751-8769

Attorneys for State of Missouri

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

I, Wm. Clark Kelly, first being duly sworn, upon oath state that I am an Assistant Attorney General for the State of Missouri; that I am authorized to sign the foregoing Application to Intervene on behalf of the State of Missouri; and that the matters set forth therein are true to the best of my knowledge and belief.

Wm Clark Kelly
Wm. Clark Kelly

Subscribed and sworn to before me, a notary public, the
17th day of September, 1936.

May Ann Wippmann

NOTARY PUBLIC
STATE OF MISSOURI
BY ()
Date