

In the matter of the application of Trigen-Kansas City District Energy Corporation, for permission, approval, and a certificate of public convenience and necessity authorizing it to acquire, own, operate, control, manage, and maintain a steam heat distribution system to provide steam heat service, and for approval of its rates and rules and regulations applying to steam heat service.

FILED
AUG 17 1989
PUBLIC SERVICE COMMISSION

James R. Stuck
Director, Industrial Marketing
The Kansas Power and Light Company
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3. On or about July 6, 1989, the Kansas City Power and Light Company (KCPL) filed an application with the Commission seeking authority to sell its steam system to Trigen-Kansas City District Energy Corporation (Trigen), and confirming the revocation of its public utility obligation to provide utility steam service as of the date of the sale. On the same date, Trigen also filed an application with the Commission requesting a certificate of public convenience and necessity to provide utility service in downtown Kansas City, Missouri, and for approval of its steam rates, rules, and regulations.

4. As a natural gas utility operating within the area which would be served by Trigen in the event the Commission were to approve the above-referenced applications, KPL has a direct interest in this proceeding. More specifically, to the extent Trigen intends to provide steam service as an alternative to natural gas services currently offered by KPL, it is clear that KPL has a substantial interest in the terms and conditions under which Trigen is to acquire the steam system from KCPL and use it to provide utility service in the downtown area.


5. KPL's interest in this proceeding is different from that of the general public and will not be adequately

represented by any other party to this proceeding.

WHEREFORE, for the foregoing reasons, KPL respectfully requests that the Commission issue an Order granting KPL leave to intervene in this proceeding.


Respectfully submitted,

THE KANSAS POWER AND LIGHT COMPANY

By 
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Application of The Kansas Power and Light Company for Leave to Intervene was deposited in the U.S. Mail, first class postage prepaid, this 16th day of August, 1989, addressed to all parties of record.


Janet E. Badsky