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RETIRED
STEVEN A. FEHR
OF COUNSEL

March 16, 2001

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

FILED

MAR 16 2001

*replaces
fax*

Missouri Public
Service Commission

Re: *Case No. EO-2001-472 - In the Matter of an Investigation respecting the sale of
UtiliCorp United Inc. 's Utility Network Construction, Operation and
Maintenance Organization*

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case is an original of Entry Of Appearance And Responses By International Brotherhood Of Electrical Workers Local Unions No. 814 And 695 In Support Of Staff Motion To Open An Investigatory Proceeding.

The Business Mangers of IBEW Local Unions No. 814 and 695 have been out of the city this week in attendance at a union utility conference, and I therefore did not learn of the Staff Motion until yesterday, March 15. I have been unable to discuss the matter with my clients until today, March 16 and have therefore been unable to mail an original of the Entry of Appearance and Responses in Support of the Staff Motion until today.

This will confirm my discussion with you that I am causing the filing of fax copies of the Entry of Appearance and Responses in Support of the Staff Motion today, March 16, and am mailing the original with this letter to you today, for delivery on Monday March 19.

Thank you for your attention and courtesy in this matter.

Sincerely,

William A Jolley
William A. Jolley

WAJ:ce
Enclosures

FILED

MAR 16 2001

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of an Investigation)
respecting the sale of UtiliCorp United)
Inc.'s Utility Network Construction,)
Operation and Maintenance Organization.)

Missouri Public
Service Commission

Case No. EO-2001-472

**Entry Of Appearance And Responses By International Brotherhood Of Electrical Workers
Local Unions No. 814 And 695 In Support Of Staff Motion To Open An Investigatory
Proceeding**

COMES NOW William A. Jolley, Jolley, Walsh, Hurley & Raisher, P.C., 204 W.
Linwood Boulevard, Kansas City, Missouri 64111, and enters his appearance in the captioned
proceeding on behalf of Local Union No. 814, International Brotherhood of Electrical Workers
("Local No. 814") and Local Union No. 695, International Brotherhood of Electrical Workers
("Local No. 695").

Local No. 814 and Local No. 695, for the reasons stated in the Staff Motion filed on
March 6, 2001, supports the Staff Motion. In further response in support of the Staff Motion,
Local No. 814 and Local No. 695 respectfully state as follows:

1. Local No. 814 and Local No. 695 are both labor organizations as defined in the
National Labor Relations Act, as amended, 29 U.S.C. Section 152, *et seq.* Local No. 814 is the
certified collective bargaining representative of numerous employees employed in various
classifications of employment by the Missouri Public Service Division of UtiliCorp United Inc.
("UtiliCorp"). Local No. 695 is the certified collective bargaining representative of numerous
employees employed in various classifications of employment by the Energy One St. Joseph
Light and Power Division of UtiliCorp.
2. The UtiliCorp employees represented by Local No. 814 and Local No. 695, as
well as the safe and reliable delivery of utility service in UtiliCorp's service area, will be affected

by the transaction at issue in the Staff Motion involving the sale of UtiliCorp's network construction, operations and maintenance business.

3. Because Local No. 814 and Local No. 695 and the employees they respectively represent will be directly affected by the Commission's determinations in connection with UtiliCorp's proposed transaction, they have direct interest in the Commission's determinations, which interests are different from those of the general public and which cannot be adequately represented by any other party. It is anticipated that, in the event that the Staff Motion is granted and the Commission enters an Order establishing a case for an investigation into the announced plan by UtiliCorp to sell its utility network construction, operation and maintenance organization, Local No. 814 and Local No. 695 will move to intervene.

4. The full name and address of Local No. 814 is as follows:

IBEW Local Union No. 814
Mike Baker, Business Manager
2111 W. Broadway
Sedalia, MO 65301
Tel: (660) 826-0814
Fax: (660) 826-1420

5. The full name and address of Local No. 695 is as follows:

IBEW Local Union No. 695
Rick Strasser, Business Manager
421 S. 8th St.
St. Joseph, MO 64501
Tel: (816) 364-1064
Fax: (816) 232-5481

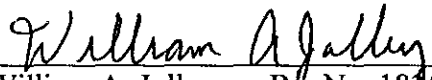
6. Local No. 814 and Local No. 695 request that service of all pleadings, correspondence, communications and orders and decisions of the Commission be made to both

Local No. 814 and Local No. 695 at the addresses shown in paragraphs 4 and 5 and to Counsel as follows:

William a . Jolley
Jolley, Walsh, Hurley & Raisher P.C.
204 W. Linwood Blvd.
Kansas City, MO 64111
Tel: (816) 561-3755
Fax: (816) 561-9355

WHEREFORE, on the basis of reasons stated in the Staff Motion and on the foregoing,
Local No. 814 and Local No. 695 support the Staff Motion to open an investigatory proceeding.

Respectfully submitted,

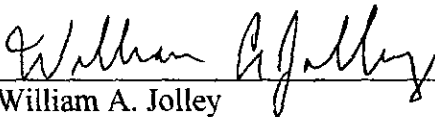

William A. Jolley Bar No. 18359

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ATTORNEYS FOR INTERNATIONAL
BROTHERHOOD OF ELECTRICAL
WORKERS, LOCAL UNION NO. 814
AND LOCAL UNION NO. 695

CERTIFICATE OF SERVICE

I hereby certify that, in addition to the 8 copies filed by fax with, and original sent by UPS this date to, the Secretary of the Commission, copies of the foregoing Entry Of Appearance And Responses By International Brotherhood Of Electrical Workers Local Unions No. 814 And 695 In Support Of Staff Motion To Open An Investigatory Proceeding have been served upon the following by depositing same in the U.S. Mail, first class delivery, on this 16th day of March, 2001.



William A. Jolley

Service copies to:

John Coffman, Esq.
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