

ATTORNEY GENERAL OF MISSOURI

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June 1, 2004

FILED
JUN 0 1 2004

Public Service Commission Governor Hotel Jefferson City, MO 65102

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RE:

In the Matter of the Future Supply, Delivery and Pricing of the Electric Service Provided by Kansas City Power & Light Company, Case No. EO-2004-0577

Dear Sir/Madam:

Enclosed for filing please find an original and 9 copies of Missouri Department of Natural Resources; Application to Intervene in the above-styled matter. Please stamp "filed" on the extra copy of the document for my files. Thank you.

Sincerely,

JEREMIAH W. (JAY) NIXON Attorney General

SHELLEY A!

Assistant Antorney General

SAW:pah Enclosure

c: Counsel of Record

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JUN 0 1 2004

STATE OF MISSOURI PUBLIC SERVICE COMMISSION

		Missouri Public Service Commission
In the Matter of the Future Supply,)	
Delivery and Pricing of the Electric)	
Service Provided by Kansas City)	Case No. EO-2004-0577
Power & Light Company)	

MISSOURI DEPARTMENT OF NATURAL RESOURCES' APPLICATION TO INTERVENE

The Missouri Department of Natural Resources (MDNR), pursuant to 4 CSR 240-2.075, respectfully requests that the Commission grant its application to intervene in the above-styled matter. This application is made for the following reasons:

- 1. On May 6, 2004, the Kansas City Power & Light Company (KCPL) filed with the Missouri Public Service Commission (PSC) its request that the Commission open an investigation to discuss "constructive regulatory responses to emerging issues that will affect the supply, delivery and pricing of the electric service provided by KCPL."
- 2. On May 25, 2004, the PSC issued an Order Directing Notice and Setting Intervention Deadline, which Order directed interested parties to file applications to intervene by no later than June 1, 2004.
- 3. MDNR, and specifically its Energy Center, is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.
- 4. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that the Energy Center will be looking at the

proposed filing from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. In particular, the Energy Center will look at the proposed filing to assess the commitment by the Company to provide low or no cost weatherization to low income families. The Energy Center's review also will be in relation to the mandate set forth in Section 640.150, RSMo. The mandate set forth in the statute includes planning for energy resource development; analyzing energy management issues; consulting and cooperating with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; assessing the potential impacts on environmental quality; and analyzing the potential for increased use of energy alternatives and making recommendations for the expanded use of such alternate energy sources and technologies.

5. The Energy Center takes no position on the filing as filed, but would welcome the opportunity to work with the Company, Staff and the Office of Public Counsel to explore developing a program that has meaningful benefits to consumers and the environment.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

JEREMIAH W. (JAY) NIXON

SHELLEY A. WOODS

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid, by United States mail, this 1st day of June, 2004, to:

John Coffman Doug Micheel Office of Public Counsel P.O. Box 7800 Jefferson City, Missouri 65102

Dana Joyce Steve Dottheim General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102

James M. Fisher 101 Madison Street, Suite 400 Jefferson City, Missouri 65101

Assistant Attorney General