

Missouri Public Utility Alliance

Missouri Association of Municipal Utilities
Municipal Gas Commission of Missouri
Missouri Joint Municipal Electric Utility Commission

2407 W. Ash
Columbia, MO 65203-0045

July 6, 2001

FILED

JUL 9 2001

**Missouri Public
Service Commission**

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102

RE: *Missouri Public Service (Utilicorp United, Inc.)*
Case No. ER-2001-672, Tariff No. 200101173

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are the original and eight (8) copies of the Application for Intervention of the Missouri Joint Municipal Electric Utility Commission. A copy of the foregoing Application has been mailed today to MPS/Utilicorp.

Thank you for your attention to this matter.

Sincerely,


Duncan E. Kincheloe

Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

JUL 9 2001

In the matter of the Tariff Filing of)
Missouri Public Service (MPS), a)
Division of UtiliCorp United, Inc.,)
to Implement a General Rate Increase for)
Retail Electric Service Provided to Customers)
in the Missouri Service Area of MPS.)

Missouri Public
Service Commission

Case No. ER-2001-672

Tariff No. 200101173

APPLICATION FOR INTERVENTION

COMES NOW the Missouri Joint Electric Utility Commission (MJMEUC) and, in accordance with 4 CSR 240-2.075, applies to intervene and become a party in the above-referenced case and, in support of this Application for Intervention, respectfully states as follows:

1. The MJMEUC is a political subdivision of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 et seq. RSMo., with authority to exercise public powers of a body corporate and politic of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MJMEUC. Fifty-five Missouri municipalities are current parties to the joint contract establishing the MJMEUC.
2. On June 8, 2001 UtiliCorp United, Inc. (UtiliCorp) filed proposed tariff sheets with the Missouri Public Service Commission (Commission) intended to implement a general increase in electric rates for its Missouri Public Service (MPS) Division of \$49,352,769. UtiliCorp stated that the primary reason for this filing was to recover the higher prices of fuel used to generate power, the cost of purchased power and the investment in plant additions.
3. As a wholesale energy customer of UtiliCorp, directly and on behalf of its contracting municipalities, the MJMEUC and its municipalities are affected by MPS fuel and purchased power costs, and thus may be adversely affected by a final order in this matter. Its interests are different from those of the general

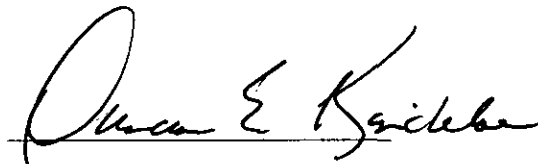
public and cannot and cannot be adequately represented by any other party. As a joint municipal utility commission with distinctive interests in this case, the public interest would be served by its proposed intervention.

4. At this stage, the MJMEUC is unsure of the position it will take on the various issues that may arise in the instant proceeding.
5. Service of all pleadings, correspondence, communications and orders and decisions of the Commission should be made to counsel as follows:

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2407 West Ash Street
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(573) 445-3279
(573) 445-0680 (FAX)

WHEREFORE, having stated its grounds for intervention, the MJMEUC requests the Commission to enter its Order granting leave to intervene as a full party in this case, and for such other and further relief as the Commission may deem appropriate.

Respectfully submitted,



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