

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

NOV 16 1998

In the Matter of the Investigation by the)
Commission of the Adequacy of Future Kansas)
Electric Generation Capacity)

 Docket Room
Docket No. 99-GIME-321 -GIE

PETITION TO INTERVENE

COMES NOW The Empire District Electric Company (Empire), and for its Petition to Intervene, states:

1. Empire is a Kansas corporation with its principal office and place of business at 602 Joplin Street, Joplin, Missouri 64801. Empire is conducting business in Kansas and is qualified and is doing business in the states of Missouri, Arkansas and Oklahoma, and is engaged, generally, in the business of generating, purchasing, transmitting, distributing and selling electric energy in portions of said states. Empire's Kansas operations are subject to the jurisdiction of the KCC.

2. Empire and its customers are not now and will not be adequately represented by any other party to this proceeding

3. Pursuant to K.S.A. 77-521 and K.A.R. 82-I-225, Empire is entitled to intervene herein.

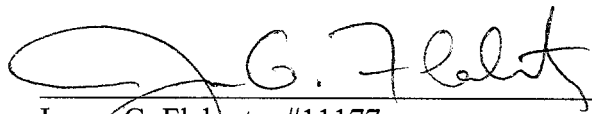
4. No party to this proceeding will be prejudiced by granting the requested intervention.

5. All communications and correspondence to Empire, including service of all notices and orders of the Commission herein are requested to be sent to the following named individuals:

Robert B. Fancher
The Empire District Electric Company
602 Joplin, P. O. Box 127
Joplin, Missouri 64802

James G. Flaherty
Anderson, Byrd, Richeson, Flaherty & Henrichs
216 S. Hickory, P. O. Box 17
Ottawa, Kansas 66067

WHEREFORE, Empire moves the Commission for an Order allowing it to intervene in this case and to become parties of record with all rights to have notice of and fully participate in this matter, including, but not limited to, the right to file briefs and motions and to participate in argument, and for all other necessary and proper purposes.



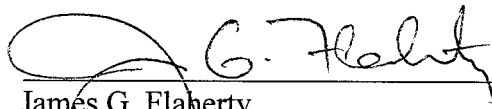
James G. Flaherty, #11177
ANDERSON, BYRD, RICHESON, FLAHERTY & HENRICH
216 S. Hickory, P. O. Box 17
Ottawa, Kansas 66067
(785) 242-1234
Attorneys for The Empire District Electric Company

VERIFICATION

STATE OF KANSAS, COUNTY OF FRANKLIN, ss:

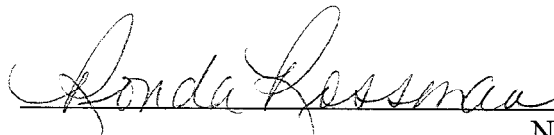
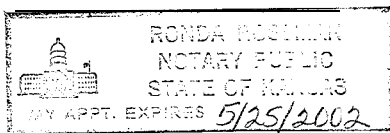
James G. Flaherty, of lawful age, being first duly sworn on oath, states:

That he is the attorney for The Empire District Electric Company and is duly authorized to make this affidavit; that he has read the above and foregoing Petition to Intervene, knows the contents thereof; and that the statements contained therein are true.



James G. Flaherty

SUBSCRIBED AND SWORN to before me this 13 day of November, 1998.



Notary Public