

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Joint Applica-)	
tion of Great Plains Energy Incor-)	
porated, Kansas City Power & Light)	
Company, and Aquila, Inc., for)	EM-2007-0374
Approval of the Merger of Aquila,)	
Inc., with a Subsidiary of Great)	
Plains Energy Incorporated and for)	
Other Related Relief)	

APPLICATION TO INTERVENE BY
SEDALIA INDUSTRIAL ENERGY USERS' ASSOCIATION

COMES NOW the SEDALIA INDUSTRIAL ENERGY USERS' ASSOCIA-
TION ("SIEUA") pursuant to 4 C.S.R. 240-2.075 and applies to
intervene herein and become a party hereto for all purposes with
respect to the joint filing by Aquila, Inc., Great Plains Energy
Incorporated ("Great Plains"), and Kansas City Power & Light
Company ("KCPL") (collectively, "Joint Applicants") on April 4,
2007. In support of this motion, SIEUA respectfully shows the
following:

1. SIEUA is an unincorporated voluntary association
consisting of large commercial and industrial users of natural
gas and electricity in the Sedalia, Missouri and in the surround-
ing area. SIEUA was formed for the purpose of economical repre-
sentation of its members' interests through intervention and
other activities in regulatory and other appropriate proceedings.

2. Current members of SIEUA are as follows: **Pittsburgh Corning Corporation**, a manufacturer of cellular glass insulation at its manufacturing facility in Sedalia, Missouri where roughly 160 workers are employed; **Waterloo Industries**, a manufacturer of tool storage equipment and employer of approximately 650 workers at its manufacturing facility in Sedalia, Missouri; **Hayes-Lemmerz International** employs roughly 800 workers at its Sedalia, Missouri facility where it manufactures automobile wheels; **EnerSys Inc.** employs approximately 500 persons in its industrial battery manufacturing facility in nearby Warrensburg, Missouri; **Alcan Cable Co.** manufactures aluminum electrical conductors and employs 250 persons in its Sedalia, Missouri operation; **Gardner Denver Corporation** employs 320 workers at its Sedalia works where it makes industrial compressors and blowers; **American Compressed Steel Corporation** employs 35 workers in scrap metal recycling at its facility near Sedalia, Missouri; and **ThyssenKrupp Stahl Company**, a major United States manufacturer of specialty and precision aluminum castings at facilities located in Warrensburg and Kingsville, Missouri, where approximately 1,100 workers are employed. Collectively, these SIEUA members provide gainful employment for approximately 3,815 workers in central Missouri.

3. SIEUA's interests in proceedings affecting the rates, terms and conditions of electric service from MPS have been previously recognized by the Missouri Public Service Commission in permitting SIEUA's intervention in numerous rate design

and electric rate proceedings concerning Aquila and its predecessor UtiliCorp, including without limitation the last series of Missouri Public Service rate increase cases, its now-concluded load research and class cost of service case, Case No. EO-2002-384, in Aquila's prior electric rate cases, Case Nos. ER-2004-0034 and ER-2005-0436, and in its current electric rate case, Case No. ER-2007-0004.

4. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

Stuart W. Conrad, Esq.
FINNEGAN, CONRAD & PETERSON, L.C.
1209 Penntower Office Center
3100 Broadway
Kansas City, Missouri 64111
Voice: (816) 753-1122
Fax: (816) 756-0373
E-mail: stucon@fcplaw.com

and

David L. Woodsmall, Esq.
FINNEGAN, CONRAD & PETERSON, L.C.
428 East Capitol Ave., Suite 300
Jefferson City, MO 65101
Voice: (573) 635-2700
Fax: (573) 635-6998
E-mail: dwoodsmall@fcplaw.com

5. On April 4, 2007, Joint Applicants sought authorization from this Commission to combine certain of their respective operations. Our understanding is that, Aquila is proposed to be operated as a wholly-owned subsidiary of Great Plains.

6. SIEUA is vitally interested in this proposed transaction and in its impact on ratepayers generally and upon SIEUA members' continued operations. As major electric customers

of Aquila, SIEUA members are positioned to be directly affected by the proposed transaction and may be bound or adversely affected by any Commission order issued in this proceeding. Because Aquila provides electricity to SIEUA members under separate contracts or rate schedules and because of SIEUA members' size and load factor, SIEUA is in the unique position of representing an interest which will not and cannot be represented adequately by any other party and which interests are direct, immediate and different from that of the general public. Therefore, it will aid the Commission and advance the public interest that SIEUA be permitted to intervene in this proceeding so as to protect those interests.

7. For purposes of 4 C.S.R. 240-2.075(2), SIEUA states that it is opposed to discriminatory pricing of electricity and related utility services. Moreover, utility ratepayers are not understood by SIEUA to be the ultimate guarantors of a utility's financial health. Rather utility management should be accountable to its shareholders for the proper and prudent management of the assets that they have provided for public service.

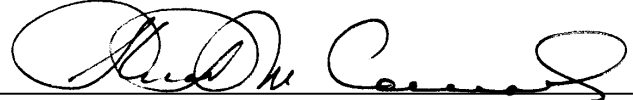
8. Certain details of the proposed transaction are currently designated as Highly Confidential and are not available to SIEUA representatives for review. Accordingly, a more detailed statement of position and identification of issues with respect to the April 4, 2007 filing may be submitted following review of these materials and other materials as yet unknown.

WHEREFORE, SIEUA prays (without prejudice to later requests for relief): (a) that SIEUA be permitted to intervene herein and be made a party hereto with all rights to have notice of and participate in hearings, to present evidence, cross-examine witnesses, file briefs and participate in argument, should any be had; (b) that a procedural schedule be adopted providing for a hearing and the filing of exhibits and testimony; (c) that following such investigation the matter be set for investigation and hearing before the Commission in which the applicant utilities shall be put to their proof regarding all

aspects of the proposed transaction; and (d) for all other needful and proper relief appropriate in the premises.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

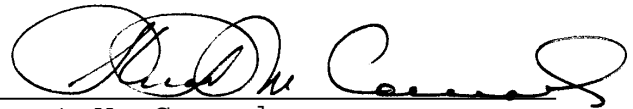


Stuart W. Conrad MBE #23966
3100 Broadway, Suite 1209
Kansas City, Missouri 64111
(816) 753-1122
Facsimile (816) 756-0373
Internet: stucon@fcplaw.com

ATTORNEYS SEDALIA INDUSTRIAL ENERGY
USERS' ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Application for Leave to Intervene by U.S. mail, postage prepaid or by electronic mail addressed to all parties by their attorneys of record as provided by the Secretary of the Commission.



Stuart W. Conrad

Dated: April 10, 2007