BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of KCP&L Greater Missouri Operations Company For Approval of a Special Incremental Load Rate for a Steel Production Facility In Sedalia Missouri

Case No. EO-2019-0244

MOTION FOR EXPEDITED TREATMENT

COMES NOW Nucor Steel Sedalia, LLC ("Nucor"), pursuant to 4 CSR 240-2.080(14) and for its Motion for Expedited Treatment respectfully states as follows:

1. Nucor Steel Sedalia, LLC ("Nucor") filed an Application to Intervene on July 31,

2019.

2. Peter J. Mattheis and Michael K. Lavanga filed a Motion to Appear and Participate *Pro Hac Vice* on July 31, 2019.

3. The Application to Intervene and Motion to Appear and Participate were filed as soon as Nucor obtained Missouri counsel.

4. On July 31, 2019, the Commission issued its Order Adopting Procedural Schedule in this case.

5. Granting expedited treatment of the Application to Intervene and the Motion to Appear and Participate will enable Nucor to become a party sooner than if the Commission waited the full ten days for responses provided for under the Commission's rules, thereby facilitating Nucor's full participation in the case. For example, once Nucor has been granted party status, Nucor's attorneys will be able to access data requests and responses through the Electronic Filing and Information System. Having access to this information through EFIS and being otherwise able to participate in the case as a party as soon as possible, is of particular importance to Nucor given the expedited schedule in this case. 6. Counsel for Nucor has consulted with counsel for all parties in this case and none have an objection to the Application to Intervene or the Motion to Appear and Participate *Pro Hac Vice*.¹

7. Expedited treatment of the Application to Intervene or the Motion to Appear and Participate *Pro Hac Vice* will have no negative effect on any customers or the general public.

8. Nucor requests that the Commission act on the Application to Intervene and Motion to Appear and Participate Pro Hac Vice no later than August 6, 2019.

WHEREFORE, Nucor respectfully requests that the Commission give expedited treatment to its Application to Intervene and Motion to Appear and Participate *Pro Hac Vice* and issue its order granting the same.

Respectfully submitted,

/s/ Stephanie S. Bell Stephanie S. Bell Ellinger & Associates, LLC 308 East High Street Suite 300 Jefferson City, MO 65101 (573)750-4100 sbell@ellingerlaw.com

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*Pending Admission Pro Hac Vice

¹ If the Commission deems it necessary to allow additional time for responses, then Nucor respectfully requests the Commission Order that the response deadline be shortened to Monday, August 5, 2019 pursuant to 4 CSR 240-2.080.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all of the parties of record or their counsel, pursuant to the Service List maintained by the Data Center of the Missouri Public Service Commission on August 1, 2019.

<u>/s/ Stephanie S. Bell</u> Stephanie S. Bell