

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Resource Plan)	
of Aquila, Inc., d/b/a Aquila Net-)	EO-2007-0298
works-MPS and Aquila Networks-L&P)	
Pursuant to 4 CSR 240-22)	

APPLICATION TO INTERVENE
BY
THE SEDALIA INDUSTRIAL ENERGY USERS' ASSOCIATION

COME NOW the SEDALIA INDUSTRIAL ENERGY USERS' ASSOCIATION ("SIEUA") pursuant to 4 C.S.R. 240-2.075 and applies to intervene herein and become a party hereto for all purposes in respect to this matter. In support, of this motion, SIEUA respectfully states:

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 surrounding area. SIEUA was formed for the purpose of economical representation 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 **Stahl Specialty 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 roughly 3,815 workers in central Missouri.

3. SIEUA's interests in proceedings affecting the rates, terms and conditions of electric service 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 recent load research and class cost of service case, Case No. EO-2002-384, in Case No. ER-2004-0034, in Aquila's prior electric rate case, Case No. ER-2005-0436, and in its current electric rate case, Case No.

ER-2007-0004. Participant companies are customers of Aquila, Inc., a regulated Missouri electric company.

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

5. SIEUA is interested in this matter and the potential implications that Commission acceptance or rejection of the Aquila's Integrated Resource Plan may have for the future cost and reliability of energy provided by this utility. As major electric customer of regulated utilities, SIEUA is in a position to be directly affected by Aquila's planning decisions and is concerned that rigorous investigation by Aquila of all cost-effective alternative plans is conducted pursuant to the Commission's existing regulations. Commission decisions concerning Aquila's compliance with these standards will have an effect on these customers. Because they receive electric service under separate contracts or rate schedules and because of their size and load factor, SIEUA is in a position to represent interests that will not and cannot be represented adequately by any other party and which interests are direct and immediate and differ from that of the general public. Therefore, it will aid the Commission and protect and advance the public interest that SIEUA

be permitted to intervene in this proceeding so as to protect its members' interests.

6. For purposes of 4 C.S.R. 240-2.075(2), SIEUA states that it generally opposes unduly discriminatory pricing and availability of electricity and related utility services. SIEUA representatives continue to review Aquila's voluminous plan filings and expect to develop a more detailed statement of positions and identification of issues with respect to them at a later time.

WHEREFORE, SIEUA prays (without prejudice to any later requests for relief save as noted above): (a) that it be permitted to intervene herein and be parties 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, and (b) for all other needful and proper relief appropriate in the premises.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



Stuart W. Conrad MBE #23966
David L. Woodsmall MBE #40747
3100 Broadway, Suite 1209
Kansas City, Missouri 64111
(816) 753-1122
Facsimile (816) 756-0373
Internet: stucon@fcplaw.com

ATTORNEYS FOR SEDALIA INDUSTRIAL
ENERGY USERS' ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading 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.

A handwritten signature in black ink, appearing to read "Stuart W. Conrad", written over a horizontal line.

Stuart W. Conrad

Dated: February 15, 2007