

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of Aquila Networks,)	
Inc. d/b/a Aquila Networks -- MPS)	
for Tariff Changes Related to Large)	GT-2004-0050
Volume Tariff Service)	

APPLICATION TO INTERVENE OF
SEDALIA INDUSTRIAL ENERGY USERS' ASSOCIATION

COMES NOW SEDALIA INDUSTRIAL ENERGY USERS' ASSOCIATION (hereinafter 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 the filing by Aquila, Inc. d/b/a Aquila Networks MPS ("MPS") of June 23, 2003. In support of this application 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 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 **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.^{1/}

3. SIEUA's interests in proceedings affecting the rates, terms and conditions of utility service from MPS have been previously recognized by the Missouri Public Service Commission in permitting SIEUA's intervention in numerous rate design and other rate proceedings concerning MPS and its predecessor UtiliCorp, including without limitation the last series of Missouri Public Service rate increase cases.

^{1/} Given that this filing by Aquila is limited to its MPS gas distribution system, active SIEUA participants may be expected to be limited to those located in or near Sedalia, Missouri.

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

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5. On June 23, 2003 MPS filed proposed tariffs with the Commission intending to implement changes in its transportation services. Most if not all SIEUA members take natural gas transportation services from MPS and are concerned regarding this filing as to the impact it may have upon the cost of their operations and the cost of natural gas transportation through the facilities of MPS.

6. SIEUA members are vitally interested in this proposed tariff, in its terms and conditions, and its impact on ratepayers generally and upon their operations specifically. As major natural gas customers of MPS, SIEUA members are in a position to be directly affected by the proposed increases and may be bound or adversely affected by any Commission order issued in this proceeding. Because MPS transports natural gas to SIEUA members on under separate contracts or the affected rate schedules and because of SIEUA members' size and load factor, these companies are in the special and unique position of representing

an interest which will not and cannot be represented adequately by any other party and which interest is direct and immediate and differs 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' interest which no other party is in a position properly to protect and adequately represent.

7. For purposes of 4 C.S.R. 240-2.075(2), SIEUA states that it is opposed to discriminatory pricing of natural gas transportation and related utility services, is opposed to increases or changes in terms and conditions that are not reasonable and are not related to necessary changes in operating conditions. SIEUA is opposed to mechanisms that would shift risk to transportation customers, purport to make them providers of last resort for the utility, and allow the utility to transfer costs to transportation customers costs that are caused by MPS's system supply operations.

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 hearing before the Commission in which the applicant utility shall be put to its proof regarding the need for the proposed changes in its tariff; and (d) for all other needful and proper relief appropriate in the premises.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

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

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ATTORNEYS FOR SEDALIA INDUSTRIAL
ENERGY USERS' ASSOCIATION

July 25, 2003

CERTIFICATE OF SERVICE

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



Stuart W. Conrad

Dated: July 25, 2003

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