

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Consideration)	
of Adoption of the PURPA Section)	
111(d)(17) Rate Design)	
Modifications to Promote Energy)	EO-2009-0248
Efficiency Investments Standard as)	
Required by Section 523 of the)	
Energy Independence and Security)	
Act of 2007)	

APPLICATION TO INTERVENE BY SEDALIA INDUSTRIAL ENERGY
USERS' ASSOCIATION

COMES NOW SEDALIA INDUSTRIAL ENERGY USERS' ASSOCIATION ("SIEUA") pursuant to 4 C.S.R. 240-2.075 and applies to intervene herein. In support, 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 automo-

bile 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. On December 15, 2008, the Staff of the Commission Filed a Motion to Establish a Case, Provide Notice and Schedule a Prehearing Conference. By an Order on December 17, 2008, the Commission granted that Motion and established this case in a single order including Case Nos. EO-2009-0247, EO-2009-0248, EO-2009-0249 and EO-2009-0250.

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. SIEUA seeks intervention because it believes that its members will or may be impacted by the outcome of this proceeding. As large industrial customers, SIEUA's interest in the terms and conditions of service is different from that of the general public, and will not or cannot adequately be represented by any other party. Therefore, it will aid the Commission and protect and advance the public interest that SIEUA be permitted to intervene in this proceeding to protect its interest which no other party is in a position properly to protect and adequately represent.

WHEREFORE, SIEUA prays: (a) that it 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; and (b) for all other needful and proper relief appropriate in the premises.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

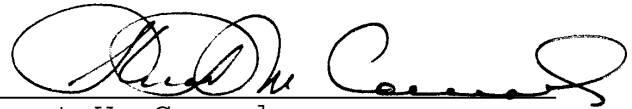


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ATTORNEYS FOR SEDALIA INDUSTRIAL
ENERGY USERS' ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by electronic means, by United States Mail, First Class postage prepaid, or by hand delivery to all known parties in interest upon their respective representatives or attorneys of record as reflected in the records maintained by the Secretary of the Commission through the EFIS system.

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

Stuart W. Conrad

Dated: January 16, 2009