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

APPLICATION TO INTERVENE OF NUCOR STEEL SEDALIA, LLC

COMES NOW Nucor Steel Sedalia, LLC ("Nucor"), pursuant to 4 CSR 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure and this Commission's July 12, 2019 Order Directing Notice, Establishing Time to Intervene, and Scheduling a Procedural Conference, and for its Application to Intervene respectfully states as follows:

1. Nucor Steel Sedalia, LLC ("Nucor") is building a new steel production facility in Sedalia, Missouri. The facility is expected to commence commercial operation in the first quarter of 2020.

2. On July 12, 2019, KCP&L Greater Missouri Operations Company ("GMO") filed an application for authority for a special incremental load rate contract for Nucor's steel production facility in Sedalia, Missouri.

3. As Nucor is a party to the contract which is the subject of this proceeding, Nucor's interests are different than that of the general public.

4. Nucor supports the relief sought by GMO in the current proceeding and reserves the right to take positions on specific issues as this case proceeds.

5. Nucor's intervention will serve the public interest by assisting the record for the Commission's decision in this case.

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6. Correspondence or communications regarding this application, including service of

all notices and orders of this Commission, should be addressed to:

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

Peter J. Mattheis* Michael K. Lavanga* Stone Mattheis Xenopoulos & Brew, PC 1025 Thomas Jefferson St NW Suite 800 West Washington, D.C. 20007 (202) 342-0800 (202) 342-0804 (fax) pjm@smxblaw.com mkl@smxblaw.com

*Pending Admission Pro Hac Vice

WHEREFORE, Nucor respectfully requests that the Commission issue its order granting

its Application for Intervention and that it be made a party hereto with all rights to participate in

this matter.

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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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 July 31, 2019.

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