

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of an Examination of)	
the Class Cost of Service and Rate)	
Design in the Missouri Jurisdic-)	EO-2002-384
tional Electric Service Operations)	[EO2002384xxx]
of Aquila, Inc. (f/k/a UtiliCorp)	
United Inc.))	

**SEDALIA INDUSTRIAL ENERGY USERS' ASSOCIATION
AND
FEDERAL EXECUTIVE AGENCIES'
SEPARATE STATEMENT OF ISSUES**

Despite several hours of discussion beginning on September 26, 2005 and concluding on September 28, 2005 and despite leaving the Commission offices that day with what counsel for Sedalia Industrial Energy Users' Association (SIEUA) and the Federal Executive Agencies' (FEA) believed was an agreed statement of issues, we were advised late today that Office of the Public Counsel desired to make further changes to the list. Counsel for the Public Counsel was not able to explain the difference between a particular statement of an issue and the position that OPC might wish to take regarding that issues to the satisfaction of the undersigned. Thus it proved impossible to reach agreement on a statement of issues.

Accordingly, SIEUA/FEA submit the following list of issues in the form that was stated as acceptable to the participating parties (including OPC) at the end of the discussions on Wednesday, September 28, 2005. These issues are acceptable to SIEUA/FEA:

CLASS COST OF SERVICE

- I. What Is the Appropriate Method for Allocating Generation-related Costs to Customer Classes?
- II. What Is the Appropriate Method for Allocating Transmission-related Costs to Customer Classes?
- III. What Is the Appropriate Method for Allocating Distribution-related Costs to Customer Classes?
- IV. What Is the Appropriate Classification of Distribution Plant into the Categories of Primary Demand, Secondary Demand, Primary Customer-related and Secondary Customer-related?
- V. What Is the Appropriate Method for Allocating Administrative and General Expenses to Customer Classes?
- VI. Should Inter-Class Revenue Adjustments Be Determined in This Case and Should Inter-Class Revenue Adjustments Be Implemented in this Case?
- VII. A. What Are the Appropriate Inter-Class Revenue Adjustments? Or
 B. What Is the Appropriate Method to Determine Them?

RATE DESIGN

- VIII. What Rate Schedules Should Be Combined, Eliminated or Added?
- IX. What Changes to the Rate Structures on Each Rate Schedule Are Appropriate?
- X. How Should the Appropriate Rate Values for Each Rate Schedule Be Determined?

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

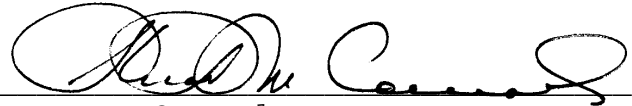


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ATTORNEY FOR SEDALIA INDUSTRIAL
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CERTIFICATE OF SERVICE

I hereby certify that I have sent true copies of the foregoing pleading either by United States Mail, facsimile or other electronic means, to the parties to this proceeding on the date indicated below.



Stuart W. Conrad
An Attorney for SIEUA

September 30, 2005