

FINNEGAN, CONRAD & PETERSON, L.C.

ATTORNEYS AND COUNSELORS AT LAW

**1209 PENNTOWER OFFICE CENTER
3100 BROADWAY
KANSAS CITY, MISSOURI 64111**

**(816) 753-1122
TELECOPIER (816) 756-0373**

Internet: stucon@fcplaw.com

**JEREMIAH FINNEGAN, P.C.
STUART W. CONRAD
C. EDWARD PETERSON***

***ALSO ADMITTED IN
KANSAS AND MASSACHUSETTS**

Writer's 24-Hour Number:
(800)821-5073 PIN:247-4501

March 16, 2001

FEDERAL EXPRESS

Mr. Dale H. Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

FILED

MAR 16 2001

**Missouri Public
Service Commission**

Re: **Investigation of UtiliCorp United Inc.
MoPSC Case No. EO-2001-472**

Dear Mr. Roberts:

Enclosed are the original and eight (8) conformed copies of a pleading, which please file in the above matter and call to the attention of the Commission.

An additional copy of the **INITIAL PAGE** of the material to be filed is enclosed, which kindly mark as received and return to me in the enclosed envelope as proof of filing.

Thank you for your attention to this important matter. If you have any questions, please call.

Sincerely yours,

FINNEGAN, CONRAD & PETERSON, L.C.

By: 

Stuart W. Conrad

SWC:s
Enclosures
cc: All Parties

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

MAR 16 2001

Missouri Public
Service Commission

In the Matter of an Investigation)
respecting the sale of UtiliCorp)
United Inc's Utility Network Con-)
struction, Operation and Mainte-)
nance Organization)

EO-2001-472

SUPPORT FOR STAFF MOTION
TO OPEN AN INVESTIGATORY PROCEEDING
BY AG PROCESSING INC A COOPERATIVE
AND
SEDALIA INDUSTRIAL ENERGY USERS' ASSOCIATION

COME NOW Ag Processing Inc a Cooperative ("AGP") and
Sedalia Industrial Energy Users' Association (SIEUA) and support
Staff's March 6, 2001 Motion to Open an Investigatory Proceeding.

AGP is separately submitting a Conditional Application
to Intervene herein. The Commission is respectfully referred
thereto concerning AGP's standing and interest in this matter.

SIEUA is an unincorporated association of large commer-
cial and industrial users of natural gas and electricity in or
near Sedalia or Warrensburg, Missouri.^{1/} Conditional inter-
vention is not yet been authorized but SIEUA indicates its
support for Staff's motion.

^{1/}Current members of SIEUA are as follows: Pittsburgh
Corning Corporation, Waterloo Industries, Hayes Lemmerz Interna-
tional, Hawker Industries, Inc., Alcan Cable Co., Gardner Denver
Corporation, American Compressed Steel Corporation, and Stahl
Specialty Company. Collectively, these SIEUA members provide
gainful employment for approximately 3,815 workers in central
Missouri.

Respectfully submitted,

EINNEGAN, CONRAD & PETERSON, L.C.



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

ATTORNEYS FOR AG PROCESSING INC A
COOPERATIVE and 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 addressed to all parties by their attorneys of record as provided by the Secretary of the Commission or disclosed by the pleadings herein.



Stuart W. Conrad

Dated: March 16, 2001