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Writer's 24-Hour Number:
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June 13, 2001

FILED²

JUN 14 2001

Missouri Public
Service Commission

FEDERAL EXPRESS

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

Re: UtiliCorp United Inc d/b/a Missouri Public Service
Company
Missouri PSC Case No. ER-2001-672

Dear Mr. Roberts:

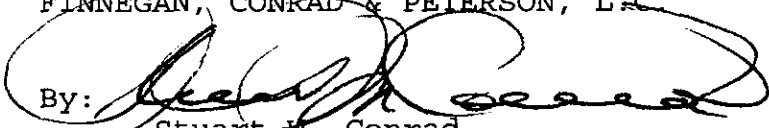
Enclosed are the original and eight (8) conformed copies of
**REQUEST FOR SUSPENSION AND APPLICATION TO INTERVENE OF SEDALIA
INDUSTRIAL ENERGY USERS' ASSOCIATION**, which please file in the
above matter and call to the attention of appropriate Commission
personnel.

An additional copy 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

FILED²
JUN 14 2001

Missouri Public
Service Commission

ER-2001-672

In the matter of the Tariff Filing)
of UtiliCorp United Inc. d/b/a)
Missouri Public Service Company for)
authority to increase its charges)
for electric service in its Missou-)
ri service area)

REQUEST FOR SUSPENSION AND
APPLICATION TO INTERVENE OF
SEDALIA INDUSTRIAL ENERGY USERS' ASSOCIATION

COMES NOW SEDALIA INDUSTRIAL ENERGY USERS' ASSOCIATION
(hereinafter SIEUA) and 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 UtiliCorp United Inc. d/b/a
Missouri Public Service Company (MoPub) on June 8, 2001. In sup-
port of this motion, 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 the Sedalia, Missouri and in the surround-
ing area. SIEUA was formed for the purpose of economical repre-
sentation of its members' interests through intervention and
other activities in regulatory and other appropriate proceedings.

2. Current members of SIEUA are as follows: **Pitts-
burgh 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 approxi-
mately 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; **Hawker Industries, 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 **Stahl Specialty 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. SIEUA's interests in proceedings affecting the rates, terms and conditions of electric service from MoPub have been previously recognized by the Missouri Public Service Commission in permitting SIEUA's intervention in numerous rate design and electric rate proceedings concerning MoPub, including without limitation the last series of MoPub rate increase cases.

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

Stuart W. Conrad, Esq.
FINNEGAN, CONRAD & PETERSON, L.C.
1209 Penntower Office Center
3100 Broadway
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5. On June 8, 2001 MoPub filed proposed tariffs with the Commission intending to increase its rates for electric service in its Missouri service area by roughly \$11 million or 17% annually. The reasons alleged for the filing include increased costs of operations and a claimed insufficient return on investment.

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 electric customers of MoPub, 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 MoPub provides electricity to SIEUA members on under separate contracts or 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 the discriminatory pricing of electricity and related utility services. However, a more detailed statement of position with respect to the June 11, 2001 filing will be submitted following a more extensive review of the tariff filing and the materials claimed to support such filing.

WHEREFORE, SIEUA prays (without prejudice to later requests for relief): (a) that the proposed tariff filing of June 8, 2001 be **suspended** for the full statutory period allowed and thereupon subjected to a full and thorough investigation and analysis; (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 tariff and all aspects of its proposed methodology of recovery; and (d) 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; and (e) for all other needful and proper relief appropriate in the premises.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

A large, stylized handwritten signature in black ink, appearing to read 'Stuart W. Conrad', is written over the firm name.

Stuart W. Conrad MBE #23966

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ATTORNEYS FOR SEDALIA INDUSTRIAL
ENERGY USERS' ASSOCIATION

June 13, 2001

VERIFICATION

STATE OF MISSOURI)
) ss.
 COUNTY OF JACKSON)

Comes now Stuart W. Conrad, and having been first duly sworn, states that he is counsel for the within applicant for intervention and has been duly authorized by appropriate authorities thereof to file this application; that he has read and is familiar with the contents thereof and that the statements therein made are true and correct to the extent of his knowledge, information and belief.



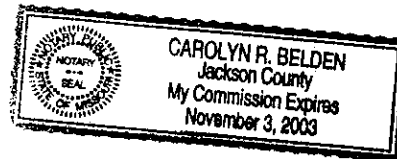
Stuart W. Conrad

IN WITNESS WHEREOF, I have hereunto set my hand and my official seal at my office in Kansas City, Jackson County, Missouri on this 13th day of June, 2001.

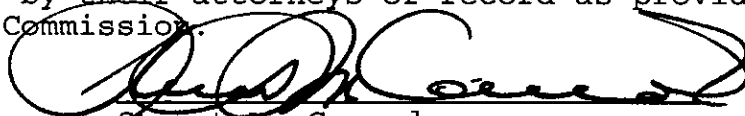

Notary Public Within and for
said County and State

(SEAL)

My Commission Expires:

Nov. 3, 2003CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Application for Leave to Intervene by U.S. mail, postage prepaid addressed to all parties by their attorneys of record as provided by the Secretary of the Commission.



Stuart W. Conrad

Dated: June 13, 2001