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3. The Petitioners request that service be made to the Petitioners and their counsel.

4. The Petitioners represent employees who may be affected by Orders entered by the Commission in this proceeding, and, accordingly, the Petitioners and the employees they represent are interested parties in this proceeding. The Petitioners herein and the employees they represent have a direct interest in this proceeding which is different from that of the general public, and which interests cannot be adequately represented by any other party.

5. The Petitioners have no current position regarding the Application herein. However, to the extent that said Application may impact on the wages, benefits, and terms and conditions of employment of the employees that the Petitioners represent, Petitioners reserve the right to participate in the proceedings to the extent necessary to protect the interests of their members.

6. On September 12, 2008, the Missouri Public Service Commission issued its Order Directing Filing and Directing Notice directing the filing of any Application to Intervene no later than October 2, 2008.

7. The Locals and their Counsel did not receive notice of this Order until just before the October 2, 2008 deadline had passed.

8. No party will be adversely affected if this Petition is granted.

WHEREFORE, having stated the grounds for intervention, their position and interest in this proceeding, the International Brotherhood of Electrical Workers, Local Unions No. 412, 1464; and 1613 hereby request that the Commission:

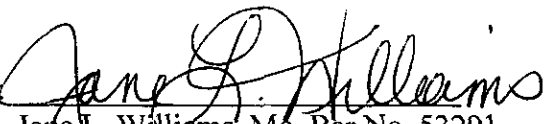
- A. Grant them leave to intervene in this proceeding on their behalf and on behalf of their members and to be heard at such time as the Commission may fix; and
- B. In all respects be a party to this proceeding.

Dated this 7th day of October, 2008.

Respectfully submitted,

BLAKE & UHLIG, P.A.
753 State Avenue
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2500 Holmes
Kansas City, Missouri 64108
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By: 
Jane L. Williams, Mo. Bar No. 53291
James R. Waers, Mo. Bar No. 26220

ATTORNEYS FOR IBEW LOCALS 412,
1464, AND 1613

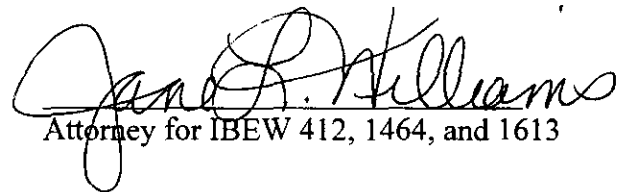
CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *Application to Intervene Out of Time With Suggestions* was served upon all parties to this action, either by U.S. Mail, Hand-delivered, transmitted by Facsimile or electronically mailed, this 7th day of October, 2008, addressed as follows:

Colleen M. Dale, Secretary
Missouri Public Service Commission
Post Office Box 360
Jefferson City, Missouri 65102

James M. Fischer, Esq.
Fischer & Dority, P.C.
101 Madison Street, Suite 400
Jefferson City, Missouri 65101

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Attorney for IBEW 412, 1464, and 1613