

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

In the Matter of the Application of)	
KCP&L Greater Missouri Operations Company)	
For Approval of a Special Incremental Load)	Case No. EO-2019-0244
Rate for a Steel Production Facility)	
In Sedalia Missouri)	

MOTION TO APPEAR AND PARTICIPATE *PRO HAC VICE*

Peter J. Mattheis and Michael K. Lavanga, pursuant to 4 CSR 240-2.040(3)(C) and Missouri Supreme Court Rules 6.01(m) and 9.03, hereby petition the Missouri Public Service Commission (the “Commission”) for leave to be permitted to appear and participate in the above-captioned proceeding. In support of this Motion to Appear and Participate *Pro Hac Vice*, Mr. Mattheis and Mr. Lavanga respectfully state as follows:

1. Mr. Mattheis and Mr. Lavanga are attorneys with the firm of Stone Mattheis Xenopoulos & Brew, PC, located at 1025 Thomas Jefferson Street, NW, 8th Floor, West Tower, Washington, D.C. 20007. Mr. Mattheis and Mr. Lavanga wish to represent Nucor Steel Sedalia, LLC *pro hac vice* in this matter.

2. Peter J. Mattheis is not admitted to practice in Missouri, but is a member in good standing of the District of Columbia Bar and the Virginia State Bar. Mr. Mattheis is also admitted to practice before the United States Court of Appeals for the Fourth Circuit, and the United States District Court for the Eastern District of Virginia. Mr. Mattheis has never been subject to disciplinary proceedings of any kind.

3. Michael K. Lavanga is not admitted to practice in Missouri, but is a member in good standing of the District of Columbia Bar and the Virginia State Bar. Mr. Lavanga has never been subject to disciplinary proceedings of any kind.

4. Neither Mr. Mattheis nor Mr. Lavanga, nor any member of Stone Mattheis Xenopoulos & Brew, PC, is under suspension or disbarment, nor is any member of Stone Mattheis Xenopoulos & Brew, PC disqualified to appear before the Missouri Public Service Commission or any other court.

5. Pursuant to Supreme Court Rule 6.01(m), a fee of \$820 has been paid to the Clerk of the Missouri Supreme Court, and the certificate attached as Exhibit A hereto was issued on July 26, 2019 by the Clerk of the Supreme Court.

6. Mr. Mattheis and Mr. Lavanga are associated in this matter with Stephanie S. Bell, with the law firm of Ellinger & Associates, LLC, 308 East High Street, Suite 300, Jefferson City, MO 65101. Ms. Bell is a member in good standing of the Missouri Bar and is qualified to practice before this Commission pursuant to 4 CSR 240-2.040(3)(A). Mr. Mattheis and Mr. Lavanga respectfully designate Ms. Bell as associate counsel. Ms. Bell has entered her appearance on behalf of Nucor Steel Sedalia, LLC in this proceeding by filing an Application to Intervene.

7. If this application to appear *pro hac vice* is granted, Mr. Mattheis and Mr. Lavanga agree to abide by the Rules of the Commission, including all disciplinary rules, and notify the Commission immediately of any matter affecting their standing at the bar of any court.

WHEREFORE, Peter J. Mattheis and Michael K. Lavanga respectfully request that this motion for admission *pro hac vice* be granted.

Respectfully Submitted,

/s/ Michael K. Lavanga

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/s/ Stephanie S. Bell

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Attorneys for Nucor Steel Sedalia, LLC

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.

/s/ Stephanie S. Bell

Stephanie S. Bell



**CLERK OF THE SUPREME COURT
STATE OF MISSOURI
POST OFFICE BOX 150**

BETSY AUBUCHON
CLERK

**JEFFERSON CITY, MISSOURI
65102**

TELEPHONE
(573) 751-4144

July 26, 2019

This will hereby acknowledge receipt of \$820 as required by Rule 6.01(m) for Michael K. Lavanga and Peter J. Mattheis, appearing In the Matter of the Application of KCP&L Greater Missouri Operations Company for Approval of a Special Rate for a Facility whose Primary Industry is the Production or Fabrication of Steel in or around Sedalia, Missouri, Case No. EO-2019-244, before the Missouri Public Service Commission.

A handwritten signature in cursive script that reads "Betsy AuBuchon".

Betsy AuBuchon, Clerk