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

In the Matter of the Application of KCP&L	)	
Greater Missouri Operations Company	)	
Containing its Annual Fuel Adjustment	)	Case No.: <b>EO-2009-0431</b>
Clause True-Up	Ś	

# FEDERAL EXECUTIVE AGENCIES' REQUEST TO INTERVENE AND MOTION FOR ADMISSION OF COUNSEL PRO HAC VICE AND DESIGNATION OF ASSOCIATE COUNSEL

Pursuant to this Commission's Rules of Practice and Procedure, 4 C.S.R. 240-2.075, the Federal Executive Agencies (FEA) hereby submit this Request for Intervention and Motion for Admission of Counsel Pro Hac Vice and designation of associate counsel in the aforementioned Docket. Attached to the cover letter is a copy of the check for \$100 that was sent to the Clerk of the Missouri Supreme Court for the request of entry of appearance as associate counsel.

The FEA consist of certain agencies of the United States Government which have offices, facilities, and or installations in the service area of the Greater Missouri Operations (GMO) Company, and which offices, facilities, and/or installations purchase utility service from GMO. The Department of Defense has been delegated authority by the General Services Administration, through Department of the Air Force counsel, to represent the consumer interests of the FEA in this proceeding under 40 U.S.C.A. 481(a)(4) and 486(d).

Chief among these Federal customers in this case is Whiteman Air Force Base, Missouri. Electricity costs represent one of the largest variable expenses of operating the Federal offices, facilities, and installations on whose behalf intervention is sought herein, and all will be affected by any action this Commission takes in this Docket. For these reasons set forth, we submit the FEA have a substantial interest in the proceedings in this Docket.

No one who practices in my office has been disqualified from practicing in any jurisdiction to which they are or have been admitted. I hereby designate Steven E. Jones, Lieutenant Colonel, US Air Force Reserve (USAFR), 1104 Southeast Talonia Drive, Lee's Summit, MO, Phone No.: (816) 682-3342, Missouri Attorney Bar No.35583, as associate counsel.

The FEA request intervention solely in their proprietary capacity as customers of Aquila, and not in the sovereign capacity of the government of the United States. At this time, the FEA is unsure about its position in this case, but will likely oppose the requested increase sought by Aquila. The counsel filing this petition is the duly authorized representative of the FEA in Aquila's service area. The name, address, telephone number, and other relevant information pertaining to Petitioner's counsel of record for purposes of service and correspondence during the course of this proceeding is:

Captain Shayla McNeill AFCESA AFLOA/JACL-ULT 139 Barnes Drive, Suite 1 Tyndall Air Force Base FL 32403 shayla.mcneill@tyndall.af.mil

**WHEREFORE**, the FEA request that the Commission grant the Request to Intervene and that the FEA be accorded full party status in this Docket.

Respectfully submitted this 16th day of June, 2009.

Shayla L. McNeill, Captain, USAF

Florida State Bar No.: 736791

Utility Litigation and Negotiation Attorney For Federal Executive Agencies (FEA)

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

In the Matter of the Application of KCP&L	)	
Greater Missouri Operations Company	)	File No. EO-2009-0431
Containing its Annual Fuel Adjustment Clause True-Up	)	

### FEDERAL EXECUTIVE AGENCIES ENTRY OF APPEARANCE AS ASSOCIATE COUNSEL

COMES NOW Steven E. Jones, Lieutenant Colonel, United States Air Force Reserves (USAFR), and respectfully enters his appearance as an attorney of record and moves for his admittance as associate counsel on behalf of the Federal Executive Agencies (FEA) in support of the motion for admission pro hac vice of Captain Shayla L. McNeill, United States Air Force (USAF).

I am a member of the Missouri bar and am currently in good standing. I have an office within Missouri as required by Public Service Commission rules. Upon information and belief, the undersigned states that Captain McNeill is an attorney in good standing and admitted to practice before the Courts of Florida and is not now nor has ever been disqualified from practice in any jurisdiction. I know of no reason that she should not be admitted to practice in these proceedings before the Commission and her admission is hereby moved. Unless otherwise required by commission rules of practice, I respectfully request that parties not be required to provide me with copies of documents.

My name, address, telephone number, and other relevant information follows:

Steven E. Jones, Lt Col, USAFR 1104 Southeast Talonia Drive Lee's Summit, MO Telephone No.: (816) 682-3342 Missouri Attorney Bar No.:35583 WHEREFORE, the FEA request that the Commission grant this motion and that they be accorded full party status in this Docket.

Dated this 15th day of June, 2009

Respectfully submitted,

STEVEN E. JONES, Lieutenant Colonel, USAFR

1104 Southeast Talonia Drive

Lee's Summit, MO

Telephone No.: (816) 682-3342 Missouri Attorney Bar No.:35583

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Federal Executive Agencies Request to Intervene and Motion for Admission of counsel Pro Hac Vice and Designation of Associate Counsel was served via electronic mail (e-mail) and sent via regular mail on this 16th day of June, 2009, on the following:

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