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"ALSO ADMITTED IN KANSAS AND MASSACHUSETTS

Writer's 24-Hour Number: (888)266-7934

August 19, 2003

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: Aquila Networks, Inc.
MoPSC Case No. ER-2004-0034 et al.

AUG 2 0 2003

Missouri Public Service Commission

Dear Mr. Roberts:

Enclosed are the original and eight (8) conformed copies of Motion for Admission of Counsel pro hoc vice and Request to Substitute Counsel, which I am transmitting on behalf of the attorney for petitioning intervenor The Federal Executive Agencies. Please file in the above matter and call to the attention of appropriate Commission personnel.

By leave of the Commission, it would be my attention to call the Motion for Admission of Counsel up at the beginning of the early prehearing conference currently set in these matters for August 25, 2004.

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

Sincerely yours,

FINNEGAN, CONRAD & PETERSON, L.C.

Stuart W. Conrad

SWC:s

Enclosures

cc: All Parties

44983.1

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

AUG 2 0 2003

Service Commission

In the matter of Aquila, Inc. d/b/a)
Aquila Networks L&P and Aquila)
Networks MPS to implement a general)
rate increase in electricity)

ER-2004-0034

MOTION FOR ADMISSION OF COUNSEL PRO HOC VICE

COMES NOW Stuart W. Conrad and respectfully moves the admission pro hoc vice of Major Craig Paulson, USAF as counsel for petitioning intervenor the Federal Executive Agencies. information and belief the undersigned states that Major Paulson is an attorney in good standing and admitted to practice before the courts of Texas and Minnesota and is not now nor has even been disqualified from practice in any jurisdiction. I know of no reason that he should not be admitted to practice in these proceedings before the Commission and his admission is hereby moved.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

Stuart W. Conrad

MBE #23966

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(816) 753-1122

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Internet: stucon@fcplaw.com

August 19, 2003

7.

ER-2004-0034

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Motion by electronic means or 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: August 19, 2003

DEPARTMENT OF THE AIR FORCE AIR FORCE LEGAL SERVICES AGENCY/UTILITY LITIGATION TEAM TYNDALL AIR FORCE BASE, FLORIDA

Major Craig Paulson AFCESA/ULT 139 Barnes Drive, Suite 1 Tyndall AFB FL 32403-5319

18 August 2003

Secretary of the Missouri Public Service Commission PO Box 360 Jefferson City MO 65102

Dear Secretary,

The Federal Executive Agencies, by and through the undersigned counsel of the Air Force Utility Litigation Team, encloses herewith a Request to Substitute Counsel in in Docket No. ER-2004-0034, Aquila Networks MPS's request to implement a general rate increase in electricity.

Please give me a call at 850-283-6348 if you need additional information or need to discuss this matter.

I am a member in good standing of the Texas and Minnesota Bars. No one in my office has been or is disqualified to appear in any of those courts.

Sincerely

CRAIG PAULSON, Major, USAF

Utility Litigation and Negotiation Attorney

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

* * * *

In the matter of Aquila Networks)	
MPS's filing to implement a general)	ER-2004-0034
rate increase in electricity)	

THE UNITED STATES DEPARTMENT OF DEFENSE AND OTHER FEDERAL EXECUTIVE AGENCIES' REQUEST TO INTERVENE AND SUBSTITUE COUNSEL

Pursuant to this Commission's Rules of Practice and Procedure 4 CSR –2.040 and 4 CSR 240-2.075, the Federal Executive Agencies (FEA) hereby submit this Request to Substitute Counsel in the aforementioned Docket.

The FEA consist of certain agencies of the United States Government which have offices, facilities, and/or installations in the service area of Aquila Networks MPS (MPS), and which offices, facilities, and/or installations purchase electric utility service from MPS. The Department of Defense has been delegated authority by the General Services Administration to represent, through Department of the Air Force counsel, the consumer interest 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, in terms of customer load, is Whiteman Air Force Base near Knob Knoster, Missouri, which is facing an annual increase in its electricity bills of almost \$700,000 if MPS's filing is approved as proposed. Indeed, electricity and/or natural gas 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 significantly 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.

On July 30th, 2003 Major Alan G. Erickson of my office intervened in this case. I have since been assigned to represent the interests of the FEA in this matter. No one who practices in my office has been disqualified form practicing in any jurisdiction to which they are or have been admitted. The FEA intervened solely in their proprietary capacity as customers of MPS, 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 to some extent, the requested increase sought by MPS. The counsel filing this petition is the duly authorized representative of the FEA in MPS'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 are:

Major Craig Paulson AFCESA/ULT 139 Barnes Drive Tyndall Air Force Base, Florida 32403 Ph: 850-283-6350; Fax: 850-283-6219 E-mail: craig.paulson@tyndall.af.mil

TX Atty #24030340 MN Atty# 0164823

WHEREFORE, the FEA request that the Commission grant their Request to Substitute Counsel and that they be accorded full party status in this Docket.

Respectfully submitted this 18th day of August 2003.

CRAIG PAULSON, Major, USAF

Utility Litigation and Negotiation Attorney

For Petitioner

TX Atty #24030340

MN Atty# 0164823

CERTIFICATE OF SERVICE

I hereby certify that I have caused the original and 8 true and correct copies of the Federal Executive Agencies' Application to Intervene to be served on the Secretary of the Missouri Public Service Commission by U.S. Mail, postage paid, on this 19 day of August 2003.

Utility Litigation and Negotiation Attorney
For FEA