



Department of Energy

Washington, DC 20585

February 23, 1987


Harvey G. Hubbs, Secretary
Public Service Commission
P.O. Box 360
305 W. High Street, 5th Floor - A Wing
Jefferson City, MO 65102

Re: Case No. AO-87-48

Dear Mr. Hubbs:

Enclosed for filing in the above-referenced cause is the original and fifteen copies of the Application For Leave To Intervene. Please return one copy stamped "filed" and bring this matter to the attention of the Commission.

Yours truly,


Paul W. Phillips

Enclosure

cc w/encl: All Parties of Record

FILED
FEB 25 1987
PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
FEB 25 1987
PUBLIC SERVICE COMMISSION

In the matter of the)
investigation of the revenue) Docket No. AO-87-48
effect upon Missouri utilities)
of the Tax Reform Act of 1986)

APPLICATION FOR LEAVE TO INTERVENE

Comes now the Department of Energy (DOE) on behalf of itself and affected federal executive agencies by counsel and, pursuant to Commission Rule 4 CSR 240-2.110, request leave to intervene in this proceeding. In support of said Application and as grounds therefor, Application states as follows:

1. Applicant Department of Energy and federal executive agencies are substantial purchasers of electric energy or natural gas, or both, from one or more jurisdictional Missouri utilities.

2. The purpose of this proceeding, which applicant supports, is to determine the impact of the recently enacted Tax Reform Act of 1986 on Missouri utilities. A preliminary review of the Act indicates that its implementation may result in a change in revenue requirements for some or all of these utilities. A change in revenue requirement of necessity involves new and different tariff schedules. These changes can affect the cost of utility service of Applicant and may be unjustly discriminatory. Therefore, Applicant has a direct interest in this proceeding and which is different from that of the general public.

3. Applicant pursuant to Section 201(a)(4) of the Federal Property and Administrative Services Act, as amended (49 U.S.C.

481(a)(4)) is being authorized to represent the executive agencies of the federal government as customers of jurisdictional Missouri utilities in this proceeding.

4. This proceeding was initiated pursuant to a Commission Order and to the best knowledge of Applicant no date has been set for hearing nor intervention, therefore this Application is timely.

5. Applicant intends to participate actively in this proceeding, with the right to file comments, present testimony and exhibits, cross-examine witnesses and be heard on brief and in oral argument.

6. Granting of this Application For Leave To Intervene will not delay this proceeding nor unduly expand its scope.

7. Copies of orders, pleadings, testimony, exhibits, comments relating to this proceeding should be served on:

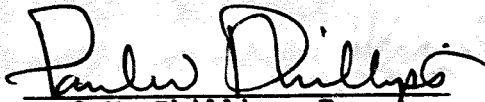
Paul W. Phillips, Esq.
U.S. Department of Energy
1000 Independence Avenue, S.W.
Room 6D-033
Washington, D.C. 20585
(202)-586-6958

and

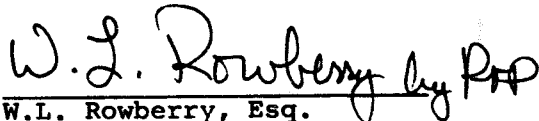
Ernest Jones
U.S. Department of Energy
FCM Division
P.O. Box 5400
Albuquerque, N.M. 87115
(505)-844-7207

WHEREFORE, Applicant prays for an Order of the Commission granting this Application.

Respectfully submitted,



Paul W. Phillips, Esq.
1000 Independence Avenue, S.W.
Room 6D-033
Washington, D.C. 20585
(202)-586-6958
Mo. Bar No. 21173



W.L. Rowberry, Esq.
P.O. Box 202
Kansas City, MO 64141
Mo. Bar No. 31811

Dated at Washington, D.C.
this 23rd day of February, 1987

United States of America)
City of Washington)
District of Columbia) SS.

Paul W. Phillips, being first duly sworn, on his oath and in his capacity as counsel for the within Applicant for Intervention, states that he is authorized to make this affidavit, that he has knowledge of the matters stated in this Application for Intervention, and that said matters are true to the best of his knowledge, information, and belief.


Paul W. Phillips

Subscribed and sworn to before me this 23rd day of February, 1987.


Notary Public

My Commission expires: Nov. 14, 1989

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Application for Intervention has been duly served upon the Staff of the Missouri Public Service Commission, the Office of Public Counsel, and the individuals on the service list of the Commission's January 30, 1987 Order, by mailing by first class mail, to each such party, a copy thereof, in properly addressed envelopes, with charges prepaid, on this 23rd day of February, 1987.


Paul W. Phillips