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August 29, 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

FILED³
SEP 02 2003

Re: **Aquila Inc.**
MoPSC Case No. EO-2002-384

**Missouri Public
Service Commission**

Dear Mr. Roberts:

Enclosed are the original and 8 conformed copies of **Motion for Admission of Counsel Pro Hac Vice**, together the original and 8 conformed copies of a Motion to Substitute Counsel which I am transmitting to you on behalf of the intervenor Executive Agencies that Maj. Paulsen would be representing. Please file both documents and call them to the attention of appropriate Commission personnel.

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

Sincerely yours,

FINNEGAN, CONRAD & PETERSON, L.C.

By: 

Stuart W. Conrad

SWC:s
Enclosures
cc: All Parties

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
SEP 02 2003

Missouri Public
Service Commission

In the Matter of an Examination of)
the Class Cost of Service and Rate)
Design in the Missouri Jurisdic-)
tional Electric Service Operations)
of Aquila, Inc. (f/k/a UtiliCorp)
United Inc.))

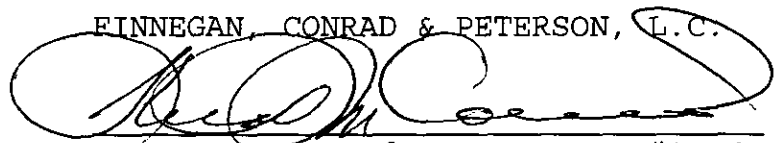
EO-2002-384

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. Upon 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.



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August 29, 2003

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 29, 2003

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

* * * * *

FILED³
SEP 02 2003

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

EO-2002-384 Missouri Public
Service Commission

THE UNITED STATES DEPARTMENT OF DEFENSE AND
OTHER FEDERAL EXECUTIVE AGENCIES'
REQUEST TO APPEAR PRO HAC VICE AS SUBSTITUTE 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. Electricity costs represent one of the largest variable expenses of operating the Federal offices, facilities, and installations on whose behalf representation 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 continuing substantial interest in the proceedings in this Docket.


Major Robert C. Cottell, Jr., formerly of my office intervened in this case and was permitted to appear Pro Hac Vice. I have since been assigned to represent the interests of the FEA in this matter as Major Cottrell's replacement. No one who practices in my office has been disqualified from practicing in any jurisdiction to which they are or have been admitted. The FEA intervened solely in their proprietary capacity as customers of Aquila, and not in the sovereign capacity of the government of the United States. 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 are:

Major Craig Paulson
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Tyndall Air Force Base, Florida 32403
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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 28th day of August 2003.


CRAIG PAULSON, Major, USAF
Utility Litigation and Negotiation Attorney
For Petitioner
TX Atty #24030340
MN Atty# 0164823