

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

In the matter of the Application of)	
Aquila, Inc., d/b/a Aquila Networks -)	
MPS and Aquila Networks - L&P for)	
Authority to Transfer Operational)	Case No. EO-2008-00046
Control of Certain Transmission Assets)	
to the Midwest Independent)	
Transmission System Operator, Inc.)	

MOTION FOR LEAVE TO APPEAR *PRO HAC VICE*

COME NOW, Alan I. Robbins, Debra D. Roby, and Elizabeth B. Teuwen, special counsel to the City of Independence, Missouri (“City”), and Mr. B. Allen Garner, City Counselor, and Ms. Dayla Bishop Schwartz, Assistant City Counselor, to respectfully petition the Commission for leave to permit Mr. Robbins, Ms. Roby and Ms. Teuwen to appear *pro hac vice* on behalf of the City, pursuant to Rule 4 CSR 240-2.040(3)(C) of the Commission’s Rules and Rules 6.01(m) and 9.03 of the Missouri Supreme Court Rules. In support of this Motion, the City states:

1. Mr. Robbins is not admitted to practice in the State of Missouri. Mr. Robbins is a member in good standing of the Bar of the District of Columbia, the United States District Court for the District of Columbia, the United States Court of Appeals for the District of Columbia Circuit and the United States Supreme Court. Mr. Robbins is also a non-resident member of the New York State Bar.

2. Mr. Robbins represents that he will comply with the Rules of Professional Conduct as set forth in Rule 4 and become subject to discipline by the courts of Missouri.

3. Ms. Roby is not admitted to practice in the State of Missouri. Ms. Roby is a member in good standing of the Bar of the District of Columbia and the United States Court of Appeals for the District of Columbia Circuit.

4. Ms. Roby represents that she will comply with the Rules of Professional Conduct as set forth in Rule 4 and become subject to discipline by the courts of Missouri.

5. Ms. Teuwen is not admitted to practice in the State of Missouri. Ms. Teuwen is a member in good standing of the Bars of Massachusetts, the District of Columbia and the United States Court of Appeals for the District of Columbia Circuit.

6. Ms. Teuwen represents that she will comply with the Rules of Professional Conduct as set forth in Rule 4 and become subject to discipline by the courts of Missouri.

7. Neither Mr. Robbins, Ms. Roby nor Ms. Teuwen have ever been disbarred, disciplined or suspended by a court of record or by a state bar association.

8. A fee in the amount of \$100 per attorney (or a total of \$300) is being filed concurrently with this Motion, as required by Rules 6.01(m) and 9.03 of the Missouri Supreme Court Rules. The receipt of payment will be forwarded as soon as practical.

9. Pursuant to Rule 9.03(c) of the Missouri Supreme Court Rules, Mr. Allen Garner, City Counselor, and Ms. Dayla Bishop Schwartz, Assistant City Counselor for the City of Independence, Missouri, shall be designated local counsel.

WHEREFORE, for the foregoing reasons, the City respectfully requests that the Commission enter an Order granting Mr. Robbins, Ms. Roby and Ms. Teuwen leave to appear *pro hac vice* for the purposes of representing the City in the captioned proceeding.

Dated this 30th day of October, 2007.

Respectfully submitted,



for

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