

**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

16 June 2005

FILED

JUN 17 2005

Colleen M. Dale, Secretary
Missouri Public Service Commission
PO Box 360
Jefferson City MO 65102-0360

**Missouri Public
Service Commission**


Dear Secretary,

The Federal Executive Agencies, by and through the undersigned counsel of the Air Force Utility Litigation Team, encloses herewith a Request to Intervene and Motion for Admission Pro Hoc Vice, in Docket No. ER-2005-0436.

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.

Attached herewith is a receipt from the Clerk of the Missouri Supreme Court in the amount of \$100. Please call me at 850-283-6350 if you need additional information or need to discuss this matter.

Sincerely



CRAIG PAULSON, Major, USAF
Utility Litigation and Negotiation Attorney



THOMAS F. SIMON
CLERK

CLERK OF THE SUPREME COURT
STATE OF MISSOURI
POST OFFICE BOX 150
JEFFERSON CITY, MISSOURI
65102

TELEPHONE
(573) 751-4144

June 8, 2005

This will hereby acknowledge receipt of \$100 as required by Rule 6.01(m) for Major Craig Paulson appearing in In the matter of Aquila, Inc., d/b/a Aquila Networks-MPS. Etc., Case No. ER-2005-0436 to be filed before the Missouri Public Service Commission.

A handwritten signature in black ink, appearing to read "Thomas F. Simon".

Thomas F. Simon, Clerk

FILED

Missouri Public
Service Commission

In the Matter of Aquila, Inc. d/b/a Aquila) **Case No.** ER-2005-0436
Networks-MPS For Authority To File Tariffs)
Increasing Electric Rates For the Service Provided)
to Customers in the Aquila Networks-MPS area)

THE UNITED STATES DEPARTMENT OF DEFENSE AND OTHER FEDERAL
EXECUTIVE AGENCIES’
REQUEST TO INTERVENE AND MOTION FOR ADMISSION OF COUNSEL PRO
HOC VICE AND DESIGNATION OF ASSOCIATE COUNSEL

Pursuant to this Commission’s Rules of Practice and Procedure 4 CSR 240-2.075, the Federal Executive Agencies (FEA) hereby submit this Request for Intervention and Motion for Admission of Counsel Pro Hoc Vice and designation of associate counsel in the aforementioned Docket. Attached to the cover letter is the required receipt for \$100 from the Clerk of the Missouri Supreme Court.

The FEA consist of certain agencies of the United States Government which have offices, facilities, and/or installations in the service area of Aquila MPS and which offices, facilities, and/or installations purchase utility service from Aquila. The Department of Defense has been delegated authority by the General Services Administration and the Department of Energy 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 is Whiteman Air Force Base near Knob Knoster, Missouri, which spends about \$3,600,000 per annum for the utility service provided by Aquila. 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 Mr. Steve Jones Senior Associate Counsel, Defense Finance & Accounting Service, Office of General Counsel, 1500 E. Bannister Road, Kansas City, MO 64197, Ph: 816-926-1658, Missouri Attorney Bar# 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 to some extent, 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 are:

Major Craig Paulson
AFCEA/ULT
139 Barnes Drive, Suite 1
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 Intervene and that they be accorded full party status in this Docket.

Respectfully submitted this 16th day of June 2005.


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

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JUN 17 2005

Missouri Public
Service Commission

Case No. ER-2005-0436

COUNSEL

COMES NOW Steve Jones 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 in support of the motion for admission *pro hoc vice* of Major Craig Paulson, USAF. I am a member of the Missouri bar in good standing. I have an office within Missouri as required by Public Service Commission rules. 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 ever 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. Unless otherwise required by commission rules of practice, I respectfully request that parties not be required to provide me with copies of documents, electronic notification will be adequate.

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

Mr. Steven E. Jones
Senior Associate Counsel
Defense Finance & Accounting Service
Office of General Counsel
1500 E. Bannister Road
Kansas City, MO 64197
Ph: 816-926-1658
Missouri Attorney Bar# 35583

WHEREFORE, the FEA request that the Commission grant this motion and that they be accorded full party status in this Docket.

Dated this 13th day of June 2005

Respectfully submitted,



Mr. Steven E. Jones
Senior Associate Counsel
Defense Finance & Accounting Service
Office of General Counsel
1500 E. Bannister Road
Kansas City, MO 64197
Ph: 816-926-1658
Missouri Attorney Bar# 35583

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 and Motion for Admission of Counsel Pro Hoc Vice to be served on the Secretary of the Missouri Public Service Commission, on the 16th day of June 2005, and upon the following:

Office Of The Public Counsel
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City MO 65102

James C. Swearengen, Esq.
Brydon, Swearengen & England
312 East Capitol Avenue
Post Office Box 456
Jefferson City, Missouri 65102-0456

A handwritten signature in black ink, appearing to read "Craig Paulson", with a long horizontal flourish extending to the right.

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