

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

Capt Frank Hollifield
AFCESA/ULT
139 Barnes Drive, Suite 1
Tyndall AFB FL 32403-5319

July 20, 2006

FILED³

JUL 24 2006

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-2007-0004.

I am a member in good standing of the Alabama Bar. 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

For Frank Hollifield
Frank Hollifield

FRANK HOLLIFIELD, Captain, USAF
Utility Litigation and Negotiation Attorney

FILED³

JUL 24 2006

Missouri Public
Service Commission

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

In the Matter of the Tariffs of Aquila, Inc., d/b/a)
Aquila Networks – MPS and Aquila Networks – L&P)
Increasing Electric Rates for the Services Provided) **Case No. ER-2007-0004**
to Customers in the Aquila Networks - MPS and) **Tariff No. YE-2007-0001**
Aquila Networks - L&P Service Areas.

**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, through Department of the Air Force counsel, to represent the consumer
interests 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.

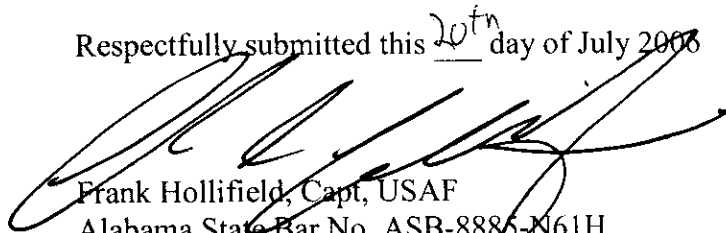
No one who practices in my office has been disqualified from practicing in any jurisdiction to which they are or have been admitted. I hereby designate Sloan Pye, Major US Air Force Reserve, 101 West Market, Suite 301, Warrensburg, MO 64093, Ph: 660-422-7400, Missouri Attorney Bar# 57077 as associate 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 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, and 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:

Capt Frank Hollifield
AFCESA/ULT
139 Barnes Drive, Suite 1
Tyndall Air Force Base, FL 32403
frank.hollifield@tyndall.af.mil

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 20th day of July 2006



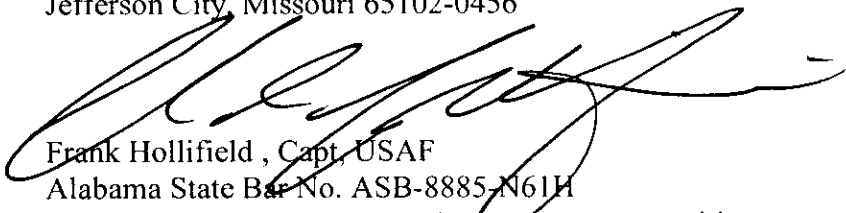
Frank Hollifield, Capt, USAF
Alabama State Bar No. ASB-8885-N61H
Utility Litigation and Negotiation Attorney For Petitioner

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 20th day of July 2006, and upon the following:

Office of 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



Frank Hollifield, Capt, USAF
Alabama State Bar No. ASB-8885-N61H
Utility Litigation and Negotiation Attorney For Petitioner



THOMAS F. SIMON
CLERK

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

TELEPHONE
(573) 751-4144

July 18, 2006

This will hereby acknowledge receipt of \$100 as required by Rule 6.01(m) for Captain Frank Hollifield 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", with a large, stylized "P" or "S" circled in the middle.

Thomas F. Simon, Clerk