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

In the Matter of the Assessment Against	)	
the Public Utilities in the State of Missouri	)	Case No. AO-2004-0610
for the Expenses of the Commission for	)	
the Fiscal Year Commencing July 1, 2004.	)	

## CENTURYTEL'S JOINT APPLICATION TO INTERVENE

COME NOW CenturyTel of Missouri, LLC and Spectra Communications Group, LLC d/b/a CenturyTel (collectively "CenturyTel"), pursuant to 4 CSR 240-2.075 and Section 386.420, RSMo 2000, and respectfully seek to intervene in this proceeding. In support of its Application to Intervene, CenturyTel states as follows:

- 1. CenturyTel is a Louisiana limited liability corporation that is duly authorized to do business in the state of Missouri, with its principle place of business at 1151 CenturyTel Drive, Wentzville, Missouri 63385. CenturyTel is a "local exchange telecommunications company" authorized to provide "telecommunications service" and a "public utility," as defined in Section 386.020, RSMo 2000.
- 2. In its Order and Notice Regarding Application for Rehearing and Stay issued in this matter on July 14, 2004, the Missouri Public Service Commission ("Commission") determined that:

The Commission will grant rehearing for the purpose of adducing additional facts on the record and accepting pertinent legal arguments regarding the constitutional and procedural issues set out in the Applicant's motion. The Commission will provide an opportunity for intervention and additional pleadings prior to determining the need for any hearings.

The Commission accordingly set an intervention deadline of August 4, 2004. As a utility company required to pay the Commission's assessment, CenturyTel has a substantial interest in this proceeding.

3. All correspondence, communications, and orders and decisions of the Commission issued in this matter should be sent to:

Larry W. Dority
FISCHER & DORITY, P.C.
101 Madison, Suite 400
Jefferson City, Missouri 65101
Telephone: (573) 636-6758
Facsimile: (573) 636-0383

- 4. CenturyTel seeks to intervene in this proceeding because it has an interest which is different from that of the general public and which may be adversely affected by a final order arising from the case. No other party to this proceeding will adequately protect CenturyTel's interest. At this point in time, CenturyTel is unsure of the position it will be taking on issues that may come before the Commission in this case.
- 5. Granting of this intervention will serve the public interest because CenturyTel will bring to this proceeding its expertise in the areas being investigated and its experience as a telecommunications provider.

WHEREFORE, CenturyTel of Missouri, LLC and Spectra Communications Group, LLC d/b/a CenturyTel respectfully request that the Commission grant their Joint Application to Intervene in this proceeding.

Respectfully submitted,

/s/ Larry W. Dority

Larry W. Dority

MBN 25617

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Attorneys for CenturyTel of Missouri, LLC and Spectra Communications Group, LLC d/b/a CenturyTel

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was hand-delivered, emailed or mailed this 4th day of August, 2004 to:

John B. Coffman

Office of the Public Counsel

P.O. Box 2230

Jefferson City, MO 65102-2230

General Counsel

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

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/s/ Larry W. Dority

Larry W. Dority