

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

In the Matter of the Application of Aquila, Inc.)	
d/b/a KCP&L Greater Missouri Operations Company)	
for Approval to Make Certain Changes in its)	Case No.: ER-2009-0090
Charges for Electric Service.)	

**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 C.S.R. 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 a copy of the check for \$100 that was sent to the Clerk of the Missouri Supreme Court for the request of entry of appearance as associate counsel.

The FEA consist of certain agencies of the United States Government which have offices, facilities, and or installations in the service area of Aquila , Inc., 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, located near Knob Noster, Missouri, which spends about \$4,350,000 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 Steven E. Jones, Lieutenant Colonel, US Air Force Reserve (USAFR), 1104 Southeast Talonia Drive, Lee's

Summit, MO, Phone No.: (816) 682-3342, Missouri Attorney Bar No.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 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 is:

Captain Shayla McNeill
AFCESA/ULT
139 Barnes Drive, Suite 1
Tyndall Air Force Base, FL 32403
shayla.mcneill@tyndall.af.mil

WHEREFORE, the FEA request that the Commission grant the Request to Intervene and that the FEA be accorded full party status in this Docket.

Respectfully submitted this 1st day of October 2008.



Shayla L. McNeill, Captain, USAF
Florida State Bar No.: 736791
Utility Litigation and Negotiation Attorney For Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Federal Executive Agencies Request to Intervene and Motion for Admission of counsel Pro Hoc Vice and Designation of Associate Counsel was served via electronic mail (e-mail) and sent via regular mail on this 1st day of October, 2008, on the following:

Staff of the Missouri Public Service Commission
Governor Office Building
P.O. Box 60
Jefferson City, MO 65102
gencounsel@psc.mo.gov

Office of the Public Counsel
Governor Office Building
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James B. Lowery
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Smith Lewis, LLP
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Columbia, MO 65205-0918
lowery@smithlewis.com

A handwritten signature in cursive script that reads "S McNeill".

Shayla L. McNeill, Capt, USAF
Florida State Bar No.736791
Utility Litigation and Negotiation Attorney For Petitioner

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

Capt Shayla L. McNeill
AFCESA/ULT
139 Barnes Drive, Suite 1
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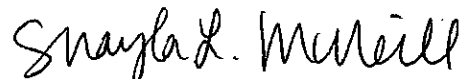
Clerk of the Missouri Supreme Court
PO Box 150
Jefferson City, MO 65102

Dear Clerk,

The Federal Executive Agencies, by and through the undersigned counsel of the Air Force Utility Litigation Team, encloses herewith a Request for entry as associate counsel before the Public Service Commission of the State of Missouri in case number ER-2009-0090. Please see attached document for more case related information.

I am a member in good standing of the Florida Bar. Attached herewith is a check in the amount of \$100 to accompany my request. Please do not hesitate to contact me at 850-283-6663 if you need additional information or need to discuss this matter. Please send a receipt to my attention at the above-mentioned address.

Sincerely,



SHAYLA L. MCNEILL, Captain, USAF
Utility Litigation and Negotiation Attorney

Attachments

1. Entry of Appearance as Associate Counsel (2 pages)
2. Check for \$100

Shayla L Mcneill (3/96)
DI. M254792785471
3925 North Oak Street Ext. Apt. 118
Valdosta, GA 31605

3283
70-6642/2711

1 Oct 08 *Date*

Pay to the Order of *Clerk of the MO Supreme Court* \$ *100.00/100*

one hundred

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DEERE EMPLOYEES
CREDIT UNION

Deere Employees Credit Union is not a subsidiary or part of John Deere.

For *Pro Hoc Vice Motion* *Shayla L. Mcneill* MP

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