

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

Major Allen G. Erickson
AFCESA/ULT
139 Barnes Drive, Suite 1
Tyndall AFB FL 32403-5319

FILED
JUL 30 2003
Missouri Public
Service Commission

28 July 2003

Secretary of the Missouri Public Service Commission
PO Box 360
Jefferson City MO 65102

Dear Secretary,

The Federal Executive Agencies, by and through the undersigned counsel of the Air Force Utility Litigation Team, encloses herewith an Application to Intervene in Docket No. ER-2004-0034, Aquila Networks MPS's request to implement a general rate increase in electricity.

Please give me a call at 850-283-6348 if you need additional information or need to discuss this matter.

Sincerely



ALLEN G. ERICKSON, Major, USAF
Utility Litigation and Negotiation Attorney

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of Aquila Networks)
MPS's filing to implement a general)
rate increase in electricity)

ER-2004-0034

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THE UNITED STATES DEPARTMENT OF DEFENSE AND
OTHER FEDERAL EXECUTIVE AGENCIES'
APPLICATION TO INTERVENE

Pursuant to this Commission's Rules of Practice and Procedure 4 CSR 240-2.075, the Federal Executive Agencies (FEA) hereby submit this Application to Intervene as a party in the aforementioned Docket.

The FEA consist of certain agencies of the United States Government which have offices, facilities, and/or installations in the service area of Aquila Networks MPS (MPS), and which offices, facilities, and/or installations purchase electric utility service from MPS. The Department of Defense has been delegated authority by the General Services Administration 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, in terms of customer load, is Whiteman Air Force Base near Knob Knoster, Missouri, which is facing an annual increase in its electricity bills of almost \$700,000 if MPS's filing is approved as proposed. Indeed, electricity and/or natural gas 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 significantly 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.

This intervention is sought by the FEA solely in their proprietary capacity as customers of MPS, 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 MPS. The counsel filing this petition is the duly authorized representative of the FEA in MPS'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 Allen G. Erickson
AFCESA/ULT
139 Barnes Drive
Tyndall Air Force Base, Florida 32403
Ph: 850-283-6348; Fax: 850-283-6219
E-mail: allen.erickson@tyndall.af.mil
NE Atty #18306

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

Respectfully submitted this 28th day of July 2003.


ALLEN G. ERICKSON, Major, USAF
Utility Litigation and Negotiation Attorney
For Petitioner
NE Atty# 18306
FL Atty# 885680