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-2002-1156
for the Expenses of the Commission for)	
the Fiscal Year Commencing July 1, 2002.)	

SOUTHWESTERN BELL TELEPHONE COMPANY'S APPLICATION TO INTERVENE

COMES NOW Southwestern Bell Telephone L.P., d/b/a Southwestern Bell Telephone Company ("SWBT"), pursuant to Section 386.420 RSMo (2000) and 4 CSR 240-2.075, respectfully seeks to intervene in this proceeding. In support of its application, Southwestern Bell states:

- 1. In its Order Setting Prehearing Conference and Setting Intervention Deadline, issued on December 2, 2002, the Missouri Public Service Commission ("Commission") stated that it "must ascertain whether the parties to this case, and the utility industry at large, are satisfied with the assessment and the costs supported by the assessment." The Commission accordingly set an intervention deadline of December 31, 2002. As a utility required to pay the Commission's assessment, SWBT has a substantial interest in this proceeding.
- 2. Southwestern Bell is a "local exchange telecommunications company" and a "public utility," and is duly authorized to provide "telecommunications service" within the State of Missouri as each of those phrases are defined in Section 386.020 RSMo (2000). Southwestern Bell's principal Missouri office is located at One SBC Center, 35th Floor, St. Louis, Missouri 63101.

¹ All statutory cites are to the Missouri Revised Statutes.

3. All correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

Paul G. Lane
Leo J. Bub
Anthony K. Conroy
Mimi B. MacDonald
Attorneys for Southwestern Bell Telephone Company
One SBC Center, Room 3520
St. Louis, Missouri 63101

- 4. Southwestern Bell seeks to intervene in this proceeding because its interests differ from those of the general public. No other party to this proceeding will adequately protect Southwestern Bell's interest.
- 5. Granting of this intervention will be in the public interest because Southwestern Bell will bring to this proceeding its expertise in the areas being investigated and its experience as a telecommunications provider.

WHEREFORE, Southwestern Bell respectfully requests the Commission to grant this Application to Intervene.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

3Y:

PAUL G. LANE #27011 LEO J. BUB #34326 ANTHONY K. CONROY #35199 MIMI B. MACDONALD #37606

Attorneys for Southwestern Bell Telephone Company

One SBC Center, Room 3520 St. Louis, Missouri 63101

314-235-4300 Telephone)/314-247-0014 (Facsimile)

paul.lane@SBC.com

CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on December 9, 2002.

Paul Ġ. Lane

DANA K. JOYCE MISSOURI PUBLIC SERVICE COMMISSION PO BOX 360 JEFFERSON CITY, MO 65102

JOHN B. COFFMAN OFFICE OF THE PUBLIC COUNSEL PO BOX 7800 JEFFERSON CITY, MO 65102

PAUL A. BOUDREAU EMPIRE DISTRICT ELECTRIC COMPANY THE MISSOURI GAS ENERGY 312 E. CAPITOL AVE. PO BOX 456 JEFFERSON CITY, MO 65102