

**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 Service)
Provided to Customers in the Aquila Networks)
MPS and Aquila Networks—L&P Service Areas.)

Case No. ER-2007-0004
Tariff No. YE-2007-0001

APPLICATION TO INTERVENE BY AARP

COMES NOW the AARP, by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this general rate case initiated by Aquila, Inc. (Aquila) when it filed new proposed tariff sheets on July 3, 2006, requesting rate increases producing an additional \$94.5M for its MPS service territory and an additional \$24.4M for its L&P service territory.

In support of this application, AARP states as follows:

1. AARP is a nonprofit, nonpartisan membership organization that advocates for people who are 50 years of age and older, seeking to promote their independence, choice and control in ways that are beneficial and affordable to them and to society as a whole.¹ AARP operates staffed offices in all 50 states, the District of Columbia, Puerto

¹ In 1999, the “American Association of Retired Persons” changed its name to simply “AARP”, in recognition of the fact that people do not have to be retired to be members. AARP is incorporated as a 501(c)(4) organization. Its affiliated AARP Foundation is incorporated as a 501(c)(3) organization.

Rico, and the U.S. Virgin Islands. There are approximately 755,000 AARP members currently residing in the state of Missouri.

AARP promotes the well-being of older persons through advocacy, education, and service on a number of priority issues. AARP has determined that advocacy for reasonable utility rates and service for seniors is one of these priority issues.

Correspondence, communications, orders and the decision in this matter should be addressed to:

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3. AARP has a long track record of professional participation before public utility commissions throughout the country, helping to provide a competent and substantial factual record in numerous cases. AARP has provided credible and persuasive testimony, assisting commissioners in crafting just and reasonable decisions on issues regarding rates and services for older utility consumers.

2. On July 5, 2006, the Commission issued an Order directing interested parties wishing to intervene to do so by July 25, 2006, and thus, this application is timely.

4. AARP's interest in this matter relates to the proposed rates, terms and conditions of service for Aquila's residential electric customers. More specifically, AARP's interest in this matter relates to how these proposals may directly and adversely impact those Missouri seniors who are receiving electric service from Aquila. This interest is different than the general public interest. Seniors are particularly vulnerable to increases in energy prices. Seniors devote a higher percentage of their total spending than do other age groups on residential energy costs. Seniors also have special needs with regard to access to electric service.

5. AARP is concerned by the size of the electric rate increases requested in Aquila's February 1, 2006 filing, as well as by the timing of the request. AARP was a party to Aquila's previous electric rate case, Case No. ER-2005-0472, but refused to sign the Stipulation and Agreement that was adopted in that case, which resulted in significant increases in residential electric rates as recently as February 2006—an 8.82% increase for MPS and a 6.26% increase for L&P. AARP expressed dissatisfaction regarding the short duration of the rate moratorium included in that agreement.

6. AARP is opposed to an unjust and unreasonable revenue requirement or a discriminatory rate design for Aquila's residential customers, and after further investigation, plans to provide the Commission with a more detailed position on the proposals and testimony that is submitted in this case. Accordingly, AARP believes that its intervention and participation in this proceeding would serve the public interest, and wishes to become a party to this case for all purposes. .

WHEREFORE, the AARP respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

/s/ John B. Coffman

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 24th day of July 2006:

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