

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

In the Matter of the Tariff Filing of Aquila,)
Inc., to Implement a General Rate)
Increase for Retail Electric Service)
Provided to Customers in its MPS and)
L&P Missouri Service Areas.)

Case No. ER-2005-0436

AQUILA'S RESPONSE TO THE REPLY OF AARP

COMES NOW Aquila, Inc. ("Aquila"), by counsel, and for its Response to the Reply of AARP to Aquila's Response and Objection to the Application to Intervene filed herein by AARP, respectfully states to the Missouri Public Service Commission (the "Commission") as follows:

1. Aquila will not reiterate the arguments set forth in its Response and Objection to AARP's Application to Intervene. Aquila would simply encourage the Commission to carefully consider the full implications of allowing AARP's intervention in this rate case proceeding.

2. AARP asserts that its interest is different from that of the general public because AARP is specifically interested in the needs of older residential customers served by Aquila **and that the Public Counsel cannot adequately represent those interests**. (This raises the questions: Is the Public Counsel truly unable to adequately represent the interests of anyone 50 years of age or older? If the Public Counsel cannot adequately represent older residential customers, who can the Public Counsel adequately represent?)

3. Following AARP's argument to its logical conclusion, interventions should be permitted for any so-called "special interest" group or specific subset of customers. For example, in order to have the needs of children represented, the Division of Family

Services and the local juvenile office should perhaps be permitted to intervene. Interventions would also be appropriate for organizations designed to represent the needs of college students, working parents, single parents, hearing-impaired citizens, citizens with mental and/or emotional disabilities, and many other “special interest” segments of society.

4. AARP is a well-respected organization and is an important part of our society, but AARP’s Application to Intervene simply does not satisfy the Commission’s intervention criteria. If all so-called “interested” parties are permitted to participate in Commission proceedings, increased costs and undue delay – both at the Commission level and at the appellate level – will most certainly result.

5. The interests of AARP’s members are not different than that of the general public who presumably is represented by the Public Counsel. The intervention of AARP will not serve the public interest, and there has been no showing by AARP that Public Counsel has refused or otherwise refrained from representing the interests of Missouri’s citizens who are 50 years of age or older. Two public counsels are not needed in order to serve the interests of the general body of Missouri ratepayers.

WHEREFORE, for the reasons aforesaid and for those set forth in Aquila's Response and Objection, AARP's proposed intervention should be denied.

Respectfully submitted,

_____/s/ Diana C. Carter_____
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ATTORNEYS FOR AQUILA, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, hand delivery, or electronic transmission, on this 28th day of June, 2005, to all counsel of record.

_____/s/ Diana C. Carter_____