BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Aquila, Inc. d/b/a Aquila)

Networks-MPS's Purchased Gas) Adjustment Factors to be Reviewed in its)

2003-2004 Actual Cost Adjustment

Case No. GR-2004-0539

STAFF RESPONSE TO COMMISSION ORDER DIRECTING FILING

COMES NOW the Staff (Staff) of the Missouri Public Service Commission

(Commission) in the above-captioned matter and for its recommendation states as follows:

1. On November 21, Staff filed its Staff Recommendation in the above styled cause.

2. On November 23, 2005, the Commission issued its Order Directing Staff to clarify

the items that Staff wants included in the Commission Order.

3. In addition to those items included in the "Recommendations" Section of the Staff

Recommendation, Staff also requests that the Commission order Aquila to respond to the

following sections:

BID DOCUMENTATION

In support of the documentation of bids received on the Northern System, MPS provided Staff with Term gas bids only (contracts greater than one month). Staff believes that documentation should also include monthly and daily bid activity that includes all terms and conditions of the request. Staff recommends that the Commission order Aquila to provide such additional documentation. Staff understands that the Company has verbally agreed to this proposal.

POOL GAS DOCUMENTATION

In support of the pool gas purchases on the Southern System, Staff believes that all gas packages designated for both MPS <u>and</u> KPS should be identified and the amounts allocated to each should be clearly noted on the monthly pool gas summary sheets. Gas is "pooled" for purposes of creating similar supply packages to assist in allocating the gas to various jurisdictions. In addition, all MPS designated gas packages should be clearly identified on the monthly pool gas summary sheets. Pool gas includes Baseload, Term, and Swing pool purchases. 4. Staff requests that the Commission direct Aquila to respond to the Bid Documentation Section to verify that there is agreement on the additional documentation that Staff is requesting. Staff further requests that Aquila respond to the Staff Recommendation under Pool Gas Documentation.

WHEREFORE, Staff recommends that the Commission issue its order in this case directing Aquila to respond to these additional sections.

Respectfully submitted,

DANA K. JOYCE General Counsel

<u>/s/ Robert V. Franson</u> Robert V. Franson Senior Counsel Missouri Bar No. 34643

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 5th day of December 2005.

/s/ Robert V. Franson