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March 10, 2003

FILED²

MAR 10 2003

Missouri Public
Service Commission

Secretary
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. GR-2003-0311

Dear Mr. Roberts:

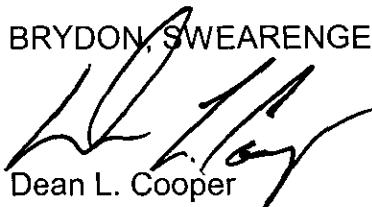
Enclosed please find an original and eight copies of a Motion for Waiver Concerning Summer PGA Filing for the Northern and Southern Systems filed on behalf of Aquila Networks - MPS. Please file stamp the enclosed extra receipt copy and return to me for my records.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



Dean L. Cooper

DLC/tli
Enclosures
cc: Robert Franson
Douglas Micheel

FILED²

MAR 10 2003

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Aquila Networks - MPS's)
Purchased Gas Adjustment)

Case No. GR-2003-0311

MOTION FOR WAIVER
CONCERNING SUMMER PGA FILING
FOR THE NORTHERN AND SOUTHERN SYSTEMS

Comes now Aquila, Inc., d/b/a Aquila Networks - MPS ("MPS"), in accordance with Commission Rule 4 CSR 240-2.060(14), and as its motion for waivers from a certain aspect of MPS's P.S.C. No. 5, 4th Revised Sheet No. 34, states to the Missouri Public Service Commission ("Commission") as follows:

1. On March 3, 2003, MPS filed in this case tariff sheets designed to reflect unscheduled changes in its Purchased Gas Adjustment ("PGA") factors for its Northern and Southern Systems.

2. MPS's P.S.C. No. 5, 4th Revised Sheet No. 34 provides in part that the "The Company shall make two scheduled PGA filings each year The summer PGA shall be filed between March 15 and April 4 of each year."

3. As stated above, MPS has made an unscheduled filing for its Northern and Southern Systems. The rates in these filings are designed to become effective on March 17, 2003. The Southern System DCCB under recovery represents 15.13% of the Company's Annual Gas Cost Level and the Northern System DCCB under recovery represents 14.34% of the Company's Annual Gas Cost Level.

4. Making the unscheduled adjustments at this time is important in order to keep the under recovery balance at a manageable level. Historically, there are not enough volumes in the summer to significantly reduce the under recovery. Making the change as proposed may allow it

to apply to enough volumes prior to the summer to reduce the under recovery.

5. Once this change is made, MPS believes that it is in the interest of its customers to keep rates as stable as possible on the Northern and Southern Systems and not again adjust rates in April with a summer filing.¹ For this reason, MPS proposes that the rates resulting from the unscheduled filing remain in effect until the filing of MPS's winter PGA in October/November 2003.

6. MPS seeks a waiver from MPS's P.S.C. No. 5, 4th Revised Sheet No. 34 to allow MPS to forego its otherwise required summer PGA filing for the Northern and Southern Systems and to thereby leave in effect MPS's rates resulting from its Northern and Southern System unscheduled filings until the filing of MPS's next winter PGA.

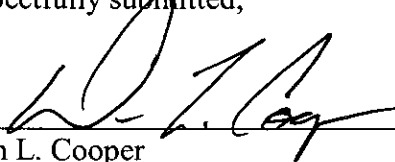
7. Good cause exists for a grant of this waiver because it will help reduce the under recovery balance now instead of waiting for it to build up and impact the next heating season and because a grant of the requested waiver will additionally serve to stabilize rates for a period on MPS's Northern and Southern Systems.

WHEREFORE, MPS requests a Commission order:

- a) granting MPS a waiver from MPS's P.S.C. No. 5, 4th Revised Sheet No. 34 to allow MPS to forego its otherwise required summer PGA filing for the northern and Southern Systems and to thereby leave in effect the Northern and Southern System rates resulting from MPS's unscheduled filing until the filing of MPS's next winter PGA; and,
- b) granting such further relief as is consistent with the relief requested herein.

¹ MPS does intend to make a normal summer PGA filing from its Eastern System.

Respectfully submitted,



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ATTORNEYS FOR AQUILA, INC. D/B/A
AQUILA NETWORKS - MPS

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered on March 10th, 2003, to the following:

Robert Franson
Office of the General Counsel
Governor Office Building
Jefferson City, Mo 65101

Douglas Micheel
Office of the Public Counsel
Governor Office Building
Jefferson City, MO 65101

