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June 26, 2003

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

RE: Case No. GR-2003-0271

FILED²
JUN 2 6 2003

Service Commission

Dear Mr. Roberts:

DAVID V.G. BRYDON

GARY W. DUFFY

PAUL A. BOUDREAU

SONDRA B. MORGAN CHARLES E. SMARR

JAMES C. SWEARENGEN

WILLIAM R. ENGLAND, III

JOHNNY K. RICHARDSON

Enclosed please find an original and eight copies of Aquila's Response to Order Granting Continuance. 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.

Parties of Record

FILED.

JUN 2 6 2003

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In re: Application of Union Electric Company		VICE SUI D	
		Onmilic	
for Authority to Participate in the Midwest)	Case No. GR-2003-0271	""SSION
ISO through a Contractual Relationship)		·
with GridAmerica.)		

AQUILA'S RESPONSE TO ORDER GRANTING CONTINUANCE

Comes now Aquila, Inc., d/b/a Aquila Networks - MPS and Aquila Networks - L&P ("Aquila"), and, in response to the Missouri Public Service Commission's ("Commission") Order Granting Continuance, states as follows:

- 1. On June 19, 2003, the Commission issued its Order Granting Continuance wherein, among other things, it ordered that "the Staff of the Commission, Union electric Company d/b/a AmerenUE, and the Office of the Public Counsel shall, and the other parties may, file pleadings as discussed herein no later than June 26, 2003." Such pleadings were to provide information concerning the impacts a "delay in this case may have on the operations of the Midwest Independent System Operator" and "Missouri customers of Ameren and other electric utilities."
- 2. This case, whether delayed or not, has a very practical impact on Aquila. At this time, Aquila's only possible connection to the Midwest Independent System Operator ("MISO") is through AmerenUE. Thus, AmerenUE's membership, or nonmembership, and the timing of such decisions directly impacts Aquila's ability to join the MISO and turn over operational control of its transmission system to MISO.
- 3. On June 20, 2003, Aquila filed an application with the Commission seeking permission to join the MISO (Case No. EO-2003-0566). Because Aquila's connection to the MISO is dependent on AmerenUE, Aquila's MISO application will need to be delayed pending resolution

of this case.

WHEREFORE, Aquila respectfully requests that the Commission give consideration to the above information.

Respectfully submitted

Dean L. Cooper

MBE#36592

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ATTORNEYS FOR AQUILA, INC. D/B/A AQUILA NETWORKS - MPS AND AQUILA NETWORKS - L&P

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered on sent by U.S. Mail, postage prepaid, on June 26, 2003, to all counsel of record.