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March 10, 2003

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

**RE: Case No. GR-2003-0311**

**FILED<sup>2</sup>**  
**MAR 10 2003**  
Missouri Public  
Service Commission

Dear Mr. Roberts:

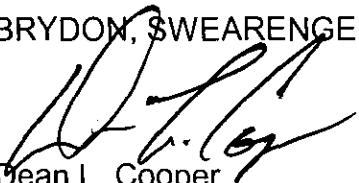
Enclosed please find an original and eight copies of a Amended Motion for Waiver Concerning Northern System Threshold filed on behalf of Aquila Networks - MPS. Please file stamp the enclosed extra receipt copy and return to me for my records.

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

FILED<sup>2</sup>

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

**AMENDED MOTION FOR WAIVER**  
**CONCERNING NORTHERN SYSTEM THRESHOLD**

Comes now Aquila, Inc., d/b/a Aquila Networks - MPS ("MPS"), in accordance with Commission Rules 4 CSR 240-2.060(14) and 4 CSR 240-2.080(20), and as its amended motion for waiver from a certain aspect of MPS's P.S.C. No. 5, 4<sup>th</sup> 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. On March 5, 2003, MPS file a Motion for Waivers concerning Unscheduled PGA Filing. In that filing, MPS sought waivers from the Commission to allow it to include certain puts and calls adjustments in this filing and to allow it to make an unscheduled filing for the Northern, although it did not meet the 15% threshold.
3. The numbers utilized in that filing were February numbers that did not include the proration for March. MPS now has available the DCCB including March proration. These numbers have been provided to the Staff. Accordingly, MPS hereby amends that aspect of its earlier Motion for Waivers which concerns the Northern System threshold issue. Commission Rule 4 CSR 240-2.080(20) provides that a pleading "may be amended within ten (10) days of filing, unless a responsive pleading has already been filed . . . ." No responsive pleading has been filed and this filing is being made with ten days of the original filing of MPS's Motion for Waivers.

4. MPS's P.S.C. No. 5, 4<sup>th</sup> Revised Sheet No. 34 provides in part that the "Company may also make an unscheduled PGA filing in each winter period, provided that at the time of such a filing there is a projected under recovery in the Deferred Carrying Cost Balance, as defined in Carrying Costs, Sheet No. 36, equal to or greater than fifteen percent of the Company's Annual Gas Cost Level. . . ."

5. At this time, the Southern System DCCB under recovery represents 15.13% of the Company's Annual Gas Cost Level and, therefore, exceeds the above threshold. However, MPS's Northern System DCCB under recovery currently represents 14.34% of the Company's Annual Gas Cost Level.

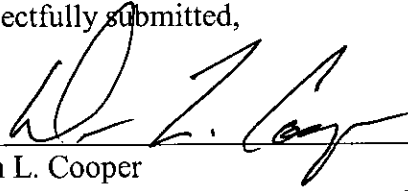
6. While the Northern System percentage is slightly less than the 15% threshold specified by the tariff, MPS believes that it is important to make the unscheduled adjustment in order to keep the under recovery balance at a manageable level. Historically, there are not enough volumes in the summer to significantly reduce the under recovery. If the change is instead made as proposed in this unscheduled filing, there may be enough volumes prior to the summer to reduce the under recovery. Failure to make the change at this time may exasperate the problem and have an adverse effect on the following heating season.

7. Therefore, MPS seeks a waiver from MPS's P.S.C. No. 5, 4<sup>th</sup> Revised Sheet No. 34 to allow MPS to make an unscheduled filing at this time for its Northern System.

WHEREFORE, MPS requests a Commission order:

- a) granting MPS a waiver from MPS's P.S.C. No. 5, 4<sup>th</sup> Revised Sheet No. 34 to allow MPS to make an unscheduled PGA filing for the Northern System; and,
- b) granting such further relief as is consistent with the relief requested herein.

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 10<sup>th</sup>, 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

