

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

In The Matter of the Application of Aquila,)
Inc. for Approval of its Experimental)
Regulatory Plan and for a Certificate of)
Convenience and Necessity Authorizing)
it to Participate in the Construction, Ownership,)
Operation, Maintenance, Removal,)
Replacement, Control and Management of)
a Steam Electric Generating Station in)
Platte County, Missouri, or alternatively for an)
Order specifically confirming that Aquila, Inc.)
has the requisite authority for said Generating)
Station Under its Existing Certificate(s).)

Case No. EO-2005-0293

MOTION

Comes now Aquila, Inc. hereinafter ("Aquila" or "Company") and for its Motion respectfully states as follows to the Missouri Public Service Commission ("Commission"):

1. By its Order issued on March 8, 2005, the Commission established April 1, 2005, as the deadline for Applications to Intervene in this proceeding. Applications to Intervene have been filed with the Commission by Kansas City Power & Light Company ("KCPL"); Sedalia Industrial Energy Users' Association; The Empire District Electric Company; Union Electric Company d/b/a AmerenUE and the Missouri Department of Natural Resources. Aquila has no objection to any of these proposed interventions.

2. Once the parties to this proceeding having been established, Aquila desires that the Commission take steps to put in place a process which will lead to the timely approval of the Company's Application. There is some urgency, from the Company's standpoint, in the expeditious approval of the Application. The terms of the Stipulation and Agreement in KCPL's pending Commission

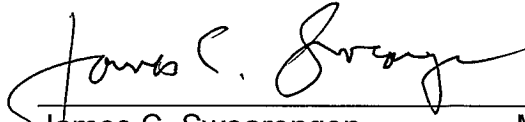
Case No. EO-2005- 0329, if approved by the Commission, will require Aquila, by August 1, 2005, to demonstrate that it has a commercially feasible financing plan for meeting its financial commitments to participate in the ownership of latan Unit

2. Aquila's financing plan is addressed in the Company's Application.

3. Consequently, Aquila believes it would be appropriate for the Commission to issue its order in this case establishing a Prehearing Conference for the purpose of the parties meeting and attempting to reach agreement with respect to a schedule to process the subject Application and/or with respect to the issues raised by the Application. In connection with any such prehearing conference and to otherwise facilitate discussions concerning the Company's proposed Regulatory Plan, Aquila also believes that it would be helpful if the Commission's Staff ("Staff") would be designated as the party to lead these discussions and to otherwise coordinate these activities. Accordingly, the Company also suggests that the Commission issue its order directing the Staff to so act.

WHEREFORE, Aquila respectfully moves the Commission to grant the relief as requested in paragraph 3. above.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James C. Swearengen". The signature is fluid and cursive, with a large initial "J" and "S".

James C. Swearengen MBE #21510

BRYDON, SWEARENGEN & ENGLAND P.C.

312 E. Capitol Avenue

P. O. Box 456

Jefferson City, MO 65102

(573) 635-7166 voice

(573) 634-7431 facsimile

Email: lrackers@brydonlaw.com

ATTORNEYS FOR AQUILA, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered via first class mail, hand delivery, or electronically on this 6th day of April, 2005 to the following:

Dan Joyce
General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

John Coffman
Office of the Public Counsel
P.O. Box 2230
Jefferson City, MO 65102

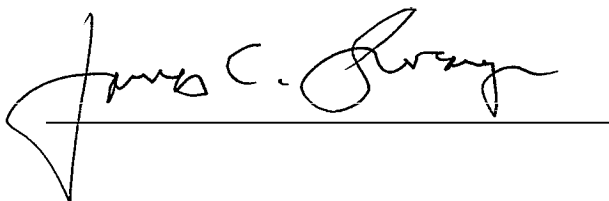
Stuart Conrad
Finnegan, Conrad & Peterson
1209 Penntower Office Center
3100 Broadway
Kansas City, MO 64111

Shelley Woods
Attorney General's Office
P.O. Box 899
Jefferson City, MO 65102

James Lowery
Smith Lewis, LLP
Suite 200, City Centre Bldg.
111 South Ninth Street
P.O. Box 918
Columbia, MO 65205-0918

James Fischer
Fischer & Dority
101 Madison, Suite 400
Jefferson City, MO 65102

Mr. Dean Cooper
Brydon, Swearngen & England, PC
P.O. Box 456
Jefferson City, MO 65102

A handwritten signature in black ink, appearing to read "James C. Swearngen", is written over a horizontal line. The signature is stylized with a large, sweeping initial 'J' and a long, horizontal stroke extending to the right.