

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

In the Matter of Resource Plan of Aquila,)	Case No. EO-2007-0298
Inc., d/b/a Aquila Networks-MPS and)	
Aquila Networks-L&P Pursuant to 4)	
CSR 240-22	

**MISSOURI DEPARTMENT OF NATURAL RESOURCES' MOTION TO
INTERVENE**

The Missouri Department of Natural Resources (MDNR), pursuant to 4 CSR 240-2.075, respectfully requests that the Commission grant its application to intervene in the above-styled matter. This application is made for the following reasons:

1. On or about February 5, 2007, Aquila, Inc., d/b/a Aquila Networks-MPS and Aquila Networks-L&P (Company) filed its Utility Resource Plan or Integrated Resource Plan as required by 4 CSR 240-22.
2. On or about February 7, 2007, the Commission issued an Order directing notice, setting a date for submission of intervention requests and scheduling a pre-hearing conference. The February 7, 2007, Order establishes February 27, 2007, as the date by which all applications to intervene in the above-styled case are to be filed.
3. MDNR, and specifically its Energy Center, is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.
4. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that the Energy Center will be looking at the

proposed filing from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. The Energy Center's review also will be in relation to the mandate set forth in Section 640.150, RSMo. The mandate set forth in the statute includes planning for energy resource development; analyzing energy management issues; consulting and cooperating with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; assessing the potential impacts on environmental quality; and analyzing the potential for increased use of energy alternatives and making recommendations for the expanded use of such alternate energy sources and technologies.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this ____ day of February, 2007.

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