## BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In The Matter of the Application of Aquila,	)	
Inc. for Permission and Approval and a	)	
Certificate of Public Convenience and	)	
Necessity Authorizing it to Acquire,	)	
Construct, Install, Own, Operate,	)	
Maintain, and otherwise Control and	)	Case No. EA-2006-0499
Manage Electrical Distribution Substation	)	
and Related Facilities in Kansas City,	)	
Jackson County, Missouri (Near the City	)	
of Raymore).	)	

## **MOTION FOR EXPEDITED TREATMENT**

COMES NOW Aquila, Inc., (hereinafter "Aquila" or "Company"), pursuant to Commission Rule 4 CSR 240-2.080 (16), and for its Motion for Expedited Treatment of the captioned case, states the following:

- 1. On June 23, 2006 Aquila filed an Application for a certificate of convenience and necessity ("Certificate") to construct, install, own, operate, maintain and otherwise control and manage an electric distribution power substation in Jackson County, within incorporated Kansas City, and near the City of Raymore, Missouri (the "Raymore North Substation"). For the reasons set forth below, Aquila is requesting that the Commission issue an order approving Aquila's Application by August 4, 2006 bearing an effective date of no later than August 15, 2006.
- 2. This motion was filed as quickly as possible after the filing of Aquila's Application.
- 3. Aquila's budgeting, engineering and construction timelines for the Raymore North Substation have been developed to execute an in-service date

based on the projected customer growth and area development, but do not include margins for significant delays. As explained in great detail in Aquila's Raymore North Substation application, this distribution substation is a critical asset and much-needed to serve increasing load demand in this fast-growing area. The 2007 pre-peak in-service date for the Raymore North Substation is achievable under normal and cost effective material acquisition and construction procedures, but any material delay could increase project costs or result in a delayed in-service date.

WHEREFORE, for the reasons aforesaid, Aquila requests the Commission issue an order granting expedited treatment of its Application in this case and that it issue an order granting the Certificate requested by August 4, 2006, bearing an effective date of no later than August 15, 2006.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND

/s/ Paul A. Boudreau

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, electronic mail or hand delivery, on the 27th day of June, 2006, to the following:

General Counsel Missouri Public Service Commission 200 Madison Street, Suite 800 P.O. Box 360 Jefferson City, MO 65102-0360 Office of the Public Counsel Governor Office Building 200 Madison Street, Suite 650 P.O. Box 2230 Jefferson City, MO 65102-2230

/s/ Paul A. Boudreau\_\_\_\_