

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

In the Matter of Aquila, Inc. d/b/a Aquila)	
Networks - MPS and Aquila Networks - L&P's)	Case No. EO-2003-0566
Application to Join the Midwest Independent)	
Transmission System Operator, Inc.)	

MOTION FOR RECONSIDERATION

COMES NOW Aquila, Inc. (Aquila or Company) and, in accordance with Missouri Public Service Commission (Commission) Rule 4 CSR 240-2.160, states as follows to the Commission as Aquila's Motion for Reconsideration:

1. On May 12, 2005, the Commission issued its Order Closing Case. The Order was said to become effective on May 22, 2005.

2. The parties to this case most recently filed a May Status Report asking that the Commission direct that another status report or a procedural schedule be filed by June 15, 2005. The Commission's Order stated, in part, that "[r]ather than continue to order and receive status reports that propose further delay, the Commission will dismiss the case, and allow Aquila to file a new application when Aquila believes it is ready to go forward with the application."

3. As the Commission is likely aware, and as has been stated in the various Status Reports that have been filed with the Commission, Aquila's application had to initially wait for the Union Electric Company d/b/a AmerenUE application to participate in the MISO (Case No. EO-003-0271) to progress to conclusion. AmerenUE's participation in the MISO was relevant to Aquila's application as the only direct connection to the MISO for Aquila's Missouri operating division is through AmerenUE.¹

4. Additionally, several circumstances have changed since Aquila originally entered

into a transmission owner agreement with the Midwest Independent Transmission System Operator, Inc. (MISO) and filed the application that initiated this case. These changes include the development of the Southwest Power Pool Regional Transmission Organization (SPP RTO), arrangements associated with cost/benefit studies to be performed by both the SPP Regional State Committee (RSC) and the MISO, and circumstances surrounding the structure and future make-up of Aquila.

5. Throughout these events, the parties to this case have continued to discuss and work on the issues implicated by Aquila's application to join the MISO. This has included exchanges of information relevant to Aquila's ultimate RTO membership and technical conferences to provide input and comments concerning both the SPP RTO and MISO analyses of Aquila's participation.

6. Aquila believes that the exchanges that have transpired between the parties to this case have been necessary, productive and worthwhile and sees no harm associated with leaving this case open. However, it remains the situation that all the information necessary for this case to move forward is not yet available. Accordingly, Aquila is indifferent as to whether this case remains open, or the Commission allows this case to be closed and Aquila files a new application at a future date when the required information is available.

WHEREFORE, it is respectfully requested that the Commission reconsider its Order Closing Case this pleading and, thereafter, issue its order granting such relief as the Commission should find to be just and reasonable.

¹ Aquila's Kansas operating division remains unconnected to the MISO.

Respectfully submitted,


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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was provided by electronic mail, on May 17th, 2005, to the following:

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