

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

In the Matter of the Application of)	
Union Electric Company for Authority)	
To Continue the Transfer of Functional)	Case No. EO-2008-0134
Control of Its Transmission System to)	
the Midwest Independent Transmission)	
System Operator, Inc.)	

APPLICATION OF AQUILA, INC. TO INTERVENE

Aquila, Inc., ("Aquila"), pursuant to Missouri Public Service Commission ("Commission") rule 4 CSR 240-2.075, requested to be allowed to intervene in the above-entitled matter. In support of its Application, Aquila states as follows:

1. Aquila is a Delaware corporation with its principal office and place of business at 20 W. 9th Street, Kansas City, Missouri 64105-1711. The Company is authorized to conduct business in Missouri through its Aquila Networks-MPS and Aquila Networks-L&P operating divisions. Aquila is engaged in the business of providing electric and industrial steam utility services to customers in those areas of the state certificated to it by the Commission.

2. Aquila is an "electrical corporation" a "heating company" and a "public utility" as those terms are defined in § 386.020, RSMo 2000, and is subject to the jurisdiction and supervision of the Commission, as provided by law.

3. Aquila has no final, unsatisfied judgments or decisions against it from state or federal regulatory agencies or courts that involve customer service and that have occurred in the three (3) years immediately preceding the filing of this Application, and has no overdue Commission annual reports or assessment fees.

4. Aquila filed copies of the registrations of a fictitious names of Aquila Networks-MPS and Aquila Networks-L&P with the Commission in Case No. EU-2002-1053. These documents are incorporated herein by reference in accordance with 4 CSR 240-2.060(1) and (G). A Certificate of Authority from the Missouri Secretary of State to the effect that Aquila, a foreign corporation, is authorized to do business in the State of Missouri, was filed with the Commission in Case No. EU-2002-1053. That document also is incorporated herein by reference.

5. Pleadings, notices, orders and other correspondence and other communications concerning this Application should be addressed:

Dennis Odell
Aquila, Inc.
20 W. 9th Street
Kansas City, MO 64105
(816) 737-7531

Renee Parsons
Senior Attorney
Aquila, Inc.
20 W. 9th Street
Kansas City, MO 64105
Telephone: (816) 467-3297

Paul A. Boudreau
Brydon, Swearngen & England, P.C.
312 E. Capitol Ave.
Jefferson City, MO 65102
(573) 635-7166
paulb@brydonlaw.com

6. On or about November 1, 2007, AmerenUE caused to be filed an Application with the Commission for permission and authority to extend its participation in the Midwest Independent Transmission System Operator

("MISO") until April 30, 2012, subject to certain conditions. Subsequently on November 6, 2007, the Commission issued an Order Providing Notice and Establishing Intervention Deadline, a copy of which was served on counsel for Aquila.

7. Aquila is an electric utility which currently has pending a proceeding with the Commission for authority to transfer operational control of certain of its transmission assets to MISO, which case has been docketed as Case No. EO-2008-0046. Ameren's Application will or could address a number of issues relating to MISO's operations, costs and benefits associated with participation in MISO, or other facets of MISO's functional control of Missouri transmission systems all of which could have relevance to Aquila's request to participate in the MISO regional transmission organization. Moreover, Aquila's only electrical connection to MISO is through AmerenUE's transmission's system.

8. Given Aquila's pending Application in Case No. EO-2008-0046, and the fact that Aquila would be interconnected to MISO solely through AmerenUE's transmission system, Aquila has an interest that is different from that of the general public which may be adversely affected by a final order in this case. Furthermore, Aquila's intervention will serve the public interest in the sense that the respective applications of AmerenUE and Aquila are practically related and have cost implications for the customers of the two companies and for control area implications generally.

9. Inasmuch as Aquila's only electrical connection to the MISO is through AmerenUE's transmission system, Aquila states that it supports the relief sought by AmerenUE.

WHEREFORE, Aquila respectfully requests that it be allowed to intervene in the above-captioned case.

Respectfully submitted,

/s/ Paul A. Boudreau

Paul A. Boudreau Mo. Bar # 33155
BRYDON, SWEARENGEN & ENGLAND, P.C.
P.O. Box 456, 312 East Capitol Avenue
Jefferson City, MO 65102-0456
Telephone: (573) 635-7166
Facsimile: (573) 634-7431
paulb@brydonlaw.com

Renee Parsons Mo. Bar # 48935
Senior Attorney
Aquila, Inc.
20 West 9th Street
Kansas City, MO 64105
Telephone: (816) 467-3297
Facsimile: (816) 467-9297
Renee.parsons@aquila.com
Attorneys for Aquila, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was electronically transmitted, sent by U.S. Mail, postage prepaid, or hand-delivered, on this 13th day of November, 2007, to:

James B. Lowery
Smith Lewis, LLP
111 South Ninth St.
P.O. Box 918
Columbia, MO 65205
lowery@smithlewis.com

Steven R. Sullivan
AmerenUE
1901 Chouteau Avenue
P.O. Box 66149 (MC 1300)
St. Louis, MO 63166
srsullivan@ameren.com

Thomas M. Byrne
AmerenUE
1901 Chouteau Avenue
P.O. Box 66149 (MC 1300)
St. Louis, MO 63166
tbyrne@ameren.com

Karl Zobrist
Sonnenschein Nath & Rosenthal
4520 Main Street
Kansas City, MO 64111
kzobrist@Blackwellsanders.com

Roger W. Steiner
Sonnenschein Nath & Rosenthal
4520 Main Street
Kansas City, MO 64111
rsteiner@sonnenschein.com

Steve Dottheim
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
steve.dottheim@psc.mo.gov

Office of Public Counsel
200 Madison Street, Suite 650
Jefferson City, MO 65102
opcservice@ded.mo.gov

/s/ Paul A. Boudreau
Paul A. Boudreau