

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

In the Matter of the Consideration of Adoption	)	
of the PURPA Section 111(d)(15) Interconnection	)	
Standard as Required by Section 1251 of the	)	Case No. EO-2006-0497
Energy Policy Act of 2005	)	

APPLICATION TO INTERVENE

Aquila, Inc. (Aquila), pursuant to Missouri Public Service Commission (Commission) Rule 4 CSR 240-2.075 and the Commission’s Order and Notice, requests that it 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 West Ninth 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 its service areas in Missouri.
2. Aquila is an “electrical corporation,” a “heating company,” and a “public utility” as those terms are defined in Section 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 within the three (3) years immediately preceding the filing of this application, and has no overdue Commission annual reports or assessment fees.

Aquila has a general rate case pending before the Commission, Case No. ER-2007-0004.

4. Aquila filed copies of the registrations of the fictitious names of Aquila Networks-MPS and Aquila Networks-L&P with the Commission in Case No. EU-2002-1053 and said documents are incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(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 and is also incorporated by reference.

5. Pleadings, notices, orders, and other correspondence and communications concerning this application should be addressed to the undersigned counsel and also to:

Dennis R. Williams
Aquila Networks
20 West Ninth Street
Kansas City, MO 64105
(816) 467-3534

6. As an electric utility, Aquila's interests differ from those of the general public. Although the company does not currently know what position it will take in this case, Aquila's interests will be directly affected and could be adversely affected by any changes to the PURPA Section 111(d)(15) Interconnection Standard that are ordered by the Commission. It is, therefore, important that Aquila be allowed to fully participate in this case so that it can protect its own interests as well as those of its stakeholders. In addition, allowing Aquila to participate as an intervenor would serve the public interest

because it will afford the company an opportunity to provide useful and relevant information that may aid the Commission in its deliberations.

WHEREFORE, Aquila prays that the Commission issue its order granting the company permission to intervene in the above-entitled matter.

Respectfully submitted,

/s/

L. Russell Mitten MBE #27881
BRYDON, SWEARENGEN & ENGLAND P.C.
312 E. Capitol Avenue
P. O. Box 456
Jefferson City, MO 65102
(573) 635-7166 voice
(573) 635-3847 facsimile
Email: rmitten@brydonlaw.com

ATTORNEYS FOR THE AQUILA, INC.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail on July 6, 2006, to:

Mr. Steve Dottheim/Mr. Denny Frey
Missouri Public Service Commission
Governor's Office Building
200 Madison Street, P.O. Box 360
Jefferson City, MO 65102
Steve.dottheim@psc.mo.gov
Denny.frey@psc.mo.gov

Lewis Mills, Public Counsel
Governor's Office Building
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102
lewis.mills@ded.mo.gov

//S//

L. Russell Mitten