

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

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

APPLICATION TO INTERVENE

COMES NOW the City of St. Joseph, Missouri (hereinafter referred to as "St. Joseph"), by and through counsel, and files its Application to Intervene in this case pursuant to Section 386.420 RSMo and 4 CSR 240-2.075. In support of this application, St. Joseph states as follows:

1. The City of St. Joseph, Missouri is a municipality of the State of Missouri located in Buchanan County. The principal place of business address for the City of St. Joseph is: City Hall, 1100 Frederick Avenue, St. Joseph, Missouri 64501.
2. All communications and pleadings in this case should be served on:

Lisa Robertson
City Attorney
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and

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3. On February 5, 2007, Aquila, Inc., d/b/a Aquila Networks - MPS and Aquila Networks - L&P (collectively, "Aquila") filed its Utility Resource Filing (a/k/a Intergrated Resource Plan, or IRP) as required by 4 CSR 240-22 of the Commission's rules. On February 7, 2007, the Commission issued its *Order Directing Notice, Setting Date for Submission of Intervention Requests, and Scheduling a Prehearing Conference* in this case, directing that interested parties wishing to intervene must do so no later than February 27, 2007. Therefore, this Application to Intervene is timely.
4. Pursuant to 4 CSR 240-2.075 (4) (A), St. Joseph states that it is a large consumer of energy supplied by Aquila. As such, St. Joseph has an interest in this matter which is different from that of the general public and which may be adversely affected by a final order arising from this case.
5. Pursuant to 4 CSR 240-2.075 (4) (B), St. Joseph states that, as a governmental body representing the residents and commercial interests of the City of St. Joseph, St. Joseph is also interested in the impact of any decisions in this proceeding on behalf of those residents and businesses. Therefore, granting the instant Application to Intervene would serve the public interest.
6. Pursuant to 4 CSR 240-2.075 (2), St. Joseph states that it is currently unsure of the position(s) it will take in this matter.

7. St. Joseph has previously participated as an Intervenor in Aquila's electric rate cases (ER-2006-0436 and ER-2007-0004).

WHEREFORE, the City of St. Joseph, Missouri, respectfully requests that the Missouri Public Service Commission grant this Application to Intervene in this matter and make St. Joseph a party to this proceeding for all purposes.

Respectfully submitted,

/s/ William D. Steinmeier

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COUNSEL FOR THE CITY OF ST.
JOSEPH, MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that the undersigned has caused a complete copy of the attached document to be electronically filed and served on the Commission's Office of General Counsel (at gencounsel@psc.mo.gov) and the Office of Public Counsel (at opcservice@ded.mo.gov), and to be served electronically or by U.S. Mail on counsel of record, on this 27th day of February 2007.

/s/ William D. Steinmeier

William D. Steinmeier

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For Aquila, Inc.