

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

The Office of the Public Counsel,	)	
	)	
Complainant,	)	
	)	
v.	)	
	)	Case No. EC-2006-0171
Aquila, Inc., d/b/a Aquila Networks-MPS	)	
and Aquila Networks-L&P,	)	
	)	
Respondent.	)	

STAFF'S CORRECTION TO INITIAL RESPONSE TO COMPLAINT

Comes now the Staff of the Missouri Public Service Commission (Staff) and respectfully submits Staff's Initial Response to Complaint:

1. On October 14, 2005, the Office of the Public Counsel (Public Counsel) filed its Complaint against Aquila, Inc., d/b/a Aquila Networks-MPS and Aquila Networks-L&P (Aquila) before the Missouri Public Service Commission (Commission).
2. On October 19, 2005, Staff filed Staff's Initial Response and Motion for Expedited Treatment (Initial Response).
3. As part of Staff's Initial Response, Staff attached Exhibits 1 and 2. Exhibit 1 was the Direct Testimony of Steve M. Traxler, Case No. ER-2005-0436 and Exhibit 2 was the Direct Testimony of Steve M. Traxler, Case No. HR-2005-0450.
4. Subsequent to the filing of Staff's Initial Response, Staff learned that Exhibit 1 had an incorrect Schedule SMT-4 attached and that Exhibit 2 had an incorrect Schedule SMT-3 attached. Attached hereto are Schedule SMT-3 to the Direct Testimony of Steve M. Traxler,

Case No. HR-2005-0450 and incorporated by reference and Corrected Schedule SMT-4 to the Direct Testimony of Steve M. Traxler, Case No. ER-2005-0436 and incorporated by reference.

5. Both of these corrections substitute Data Request No. MPSC-0263 as the appropriate aforementioned schedules. These corrections are also being filed in case nos. ER-2005-0436 and HR-2005-0450.

WHEREFORE, Staff respectfully submits these corrections to Staff's Initial Response.

Respectfully submitted,

DANA K. JOYCE
General Counsel

/s/ Robert V. Franson

Robert V. Franson
Senior Counsel
Missouri Bar No. 34643

Attorney for the Staff of the
Missouri Public Service Commission

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Jefferson City, MO 65102
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 28th day of October, 2005. .

/s/ Robert V. Franson

AQUILA, INC.
AQUILA NETWORKS-MISSOURI (ELECTRIC)
CASE NO. ER-2005-0436
MISSOURI PUBLIC SERVICE COMMISSION
DATA REQUEST NO. MPSC-0263

DATE OF REQUEST: August 4, 2005
DATE RECEIVED: August 4, 2005
DATE DUE: August 14, 2005
REQUESTOR: Lesley Preston

REQUEST:

1.) Please provide, for the last 5 years, the annual FAS 106 expense for the MPS & L&P Divisions.
2.) Please also provide the amount funded and any explanation for differences between the amount funded and the annual expense. 3.) What type of funding vehicle is used to accumulate the annual contribution?

RESPONSE:

1) See attachment MPSC0263 FAS 106 Expense.xls
2) See attachment MPSC0263 Employee Contributions. Prior to 2003 VEBA funding was equal to the annual expense. Starting in 2003, the contributions would be equal to the claims paid less amounts returned from the VEBA trust. There is not a regulatory requirement that Missouri funding be equal to the annual expense.
3) Funding amounts for FAS 106 are deposited into the VEBA trust for participating groups of employees. For non-participating groups FAS 106 is funded as claims are paid.

ATTACHMENT:

MPSC0263 FAS 106 Expense.xls
MPSC0263 Employer Contributions.xls

ANSWERED BY: Virginia Hollensbe

DATE ANSWERED: 8/16/05

Aquila, Inc.
Missouri Electric Data Request MPSC0263
FAS 106 Contributions

Division	GLBU	Employer Contribution 2001	Employer Contribution 2002	Employer Contribution 2003	Employer Contribution 2004
Aquila Energy Corporation	AEC		18,208	45,119	43,918
Aquila Gas Pipeline	AEC		14,702	36,505	0
Gas Supply Service	GSS		4,929	2,398	3,550
Missouri Gas Pipeline	MGC		(1,028)	2,079	0
Michigan Gas Utilities	MGD		1,892,731	1,193,734	1,750,691
Missouri Public Service - Distribution	MPD		887,076	163,178	68,828
Missouri Public Service - Generation	MPG		324,148	(26,050)	40,477
Peoples Natural Gas	PND		2,159,431	2,529,860	2,333,909
Seward County Pipeline	SCP		871	(1)	0
St. Joseph - Distribution	SJD		(158,431)	222,370	(52,234)
St. Joseph - Generation	SJG		83,301	256,970	196,409
Service One	STI		30,910	8,893	0
Everest	UCS		202	4	0
UtiliCorp Corporate	UCU		294,388	(727,709)	(982,923)
UtiliCorp Energy Delivery	UED		336,954	482,033	359,472
UtiliCorp Power Service	UPS			3,381	6,383
WestPlains Energy - Colorado - Distribution	WCD		390,413	437,081	346,426
WestPlains Energy - Colorado - Generation	WCG		116,459	131,718	95,898
WestPlains Energy - Kansas - Distribution	WKD		497,164	395,967	494,348
WestPlains Energy - Kansas - Generation	WKG		295,752	236,019	237,095
Grand Total		3,912,357	7,188,180	5,393,549	4,942,247

Note: 2001 Employer Contributions not readily available by BU and 2005 Contributions are not available yet.

Aquila, Inc.
Missouri Electric Data Request MPSC0263
FAS 106 Expense for MPS & SJLP

Direct Expense

Direct/Allocation Resource	Direct 1719 Year				Through June
Sum of Total Amt					2005
Unit	2001	2002	2003	2004	
MPD	792,756	712,272	427,967	908,551	429,740
MPG	282,996	225,588	132,840	18,582	120,267
SJD	2,976,144	603,024	740,909	1,164,688	884,883
SJG			(8,052)	23,310	40,885
Grand Total	4,051,896	1,540,884	1,293,664	2,115,131	1,475,775

Allocated FAS 106 Expense

Allocated BU Resource	ESF Allocation 1719 Year				Through June
Sum of Total Amt					2005
Unit	2001	2002	2003	2004	
MPD	52,903	34,322	38,292	(19,194)	2,600
MPG	15,369	9,906	4,965		
SJD	11,614	8,886	11,948	(6,467)	917
SJG	8,198	5,583	2,221		
Grand Total	88,083	58,698	57,425	(25,661)	3,517

Allocated BU Resource	GSS Allocation 1719 Year				Through June
Sum of Total Amt					2005
Unit	2001	2002	2003	2004	
MPD	1,093	706	411	593	641
MPG	173	101	7		
SJD	13	96	46	79	82
Grand Total	1,278	902	465	672	722

Allocated BU Resource	UED Allocation 1719 Year				Through June
Sum of Total Amt					2005
Unit	2001	2002	2003	2004	
MPD	22		(8,777)	35,607	78,980
SJD	6		(2,002)	9,234	24,990
Grand Total	28	0	(10,779)	44,841	103,970

Allocated BU Resource	UPS Allocation (All) Year				Through June
Sum of Total Amt					2005
Unit	2001	2002	2003	2004	
MPG				963	10,062
SJG				345	3,908
Grand Total	0	0	0	1,308	13,971

Total Direct & Allocated	4,141,285	1,600,484	1,340,775	2,136,290	1,597,955
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