

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

In the Matter of the Tariffs of Aquila, Inc., d/b/a )  
Aquila Networks - MPS and Aquila Networks )  
- L&P Increasing Electric Rates for the )  
Services Provided to Customers in the Aquila )  
Networks - MPS and Aquila Networks - L&P )  
Service Areas. )

**Case No. ER-2007-0004**

Tariff No. YE-2007-0001

**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. 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  
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and

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3. On July 3, 2006, Aquila, Inc., d/b/a Aquila Networks - MPS and Aquila Networks - L&P (collectively, "Aquila") submitted proposed tariff sheets with the Missouri Public Service Commission designed to implement a general rate increase for retail electric service provided by Aquila in its Aquila Networks - MPS and Aquila Networks - L&P service areas. On July 5, 2006, the Commission issued its *Order Directing Notice, Suspending Tariff, Setting Hearings, and Directing Filings* in this case, directing that interested parties wishing to intervene must do so on or before July 25, 2006. This Application to Intervene is, therefore, timely filed.
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. St. Joseph desires to participate fully in this proceeding.
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 participated as an Intervenor in Aquila's previous electric rate case (ER-2006-0436).

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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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](mailto:gencounsel@psc.mo.gov)) and the Office of Public Counsel (at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)), and to be served electronically or by U.S. Mail on counsel shown below, on this 11<sup>th</sup> day of July 2006.

**/s/ William D. Steinmeier**

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