

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

In Re: Union Electric Company's )	
2008 Utility Resource Filing Pursuant to )	Case No. EO-2007-0409
4 CSR 240-Chapter 22. )	

**APPLICATION TO INTERVENE OF AQUILA, INC.**

Comes now, Aquila, Inc., ("Aquila" or the "Company"), pursuant to Missouri Public Service Commission ("Commission") rule 4 CSR 240-2.075, and files its Application to Intervene in the referenced case. In support thereof, Aquila states as follows:

1. On April 19, 2007, Union Electric Company, d/b/a AmerenUE ("AmerenUE"), filed a Motion to Establish A Proceeding and Request for Waivers (the "Motion"). AmerenUE's Motion was docketed as captioned above. The stated purpose of AmerenUE's filing is to comply with the requirement that it file waiver requests associated with its next integrated resource plan ("IRP") filing. In that regard, AmerenUE has requested a waiver of portions of rules 4 CSR 240-22.030, 4 CSR 240-22.050, 4 CSR 240-22.060, and 4 CSR 240-22.070.

2. On April 20, 2007, the Commission issued an Order Adding Parties, Providing Notice, and Directing Response. The Order stated that "[a]ny proper person wishing to intervene in this matter shall file an application to do so." See, ¶¶ORDERED: 7.

3. Like AmerenUE, Aquila, through its Missouri operating divisions, Aquila Networks-MPS, and Aquila Networks-L&P, is an electric utility regulated by the Commission and subject to the requirements of Chapter 22 of the Commission's rules ("Electric Utility Resource Planning"). In fact, Aquila filed its

IRP with the Commission on February 5, 2007, in a case docketed as EO-2007-0298. Aquila is interested in monitoring the proceedings in AmerenUE's case in order to gain an understanding of the standards and requirements to be applied by the Commission when granting waivers from its resource planning rules. At this time, Aquila neither supports nor opposes the relief sought by AmerenUE and, further, is unsure of the position it will take in the case.

4. Aquila has an interest that is different from that of the general public. As noted, Aquila is a regulated electric utility and no other proper party to the case can represent its interests or views. Depending on the manner in which AmerenUE's requests are handled, the final order arising out of this case may adversely affect Aquila's interests.

5. As a regulated electric utility in the state of Missouri, Aquila's experience and insights concerning resource planning practices will serve the public interest.

WHEREFORE, for the reasons aforesaid, Aquila requests that the Commission issue an order granting its application to intervene in the captioned proceeding and for such other orders and relief as may be appropriate in the circumstances.

Respectfully submitted,

/s/ Paul A. Boudreau

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ATTORNEYS FOR AQUILA, INC.

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, electronic mail or hand delivery, on May 1, 2007, to the following:

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