

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

In the Matter of Aquila Networks - MPS's	)	
Purchased Gas Adjustment factors to be reviewed	)	Case No. GR-2004-0539
in its 2003-2004 Actual Cost Adjustment.	)	

In the Matter of Aquila Networks - L&P's	)	
Purchased Gas Adjustment factors to be reviewed	)	Case No. GR-2004-0538
in its 2003-2004 Actual Cost Adjustment.	)	

**MOTION TO CONSOLIDATE**

Comes now Aquila, Inc. ("Aquila"), and as its Motion to Consolidate, states to the Missouri Public Service Commission ("Commission") as follows:

1. The Commission previously opened the above-referenced cases for the purpose of reviewing the Aquila Networks - MPS and Aquila Networks - L&P 2003-2004 Actual Cost Adjustments ("ACA").

2. Prior to this year, the ACA cases for Aquila Networks - MPS and Aquila Networks - L&P systems were treated separately as those two systems were operated under separate tariffs. As a result of Aquila's last natural gas rate case (Case No. GR-2004-0072), the two systems are now operated under a single set of tariff sheets.

3. Accordingly, Aquila believes that there are common questions of law and fact in the above-captioned cases and that the consolidation of Cases Nos. GR-2004-0539 and GR-2004-0538 would be administratively expedient in that it would simplify the filings to be made under the purchased gas adjustment ("PGA")/ACA process and discovery to be answered within the cases.

4. The Aquila Networks - MPS and Aquila Networks - L&P systems continue to operate under separate, system-specific rates. The Motion will not change this fact. It will merely simplify

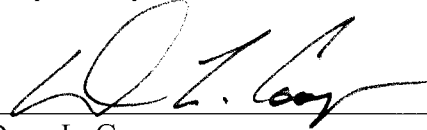
the process.

5. Counsel for Aquila has discussed this matter with counsel for the Staff of the Commission and counsel for the Office of the Public Counsel and they have indicated that they have no objection to this motion.

6. Aquila must make its winter PGA filing(s) between October 15, 2004 and November 4, 2004 (it will likely do so in the latter half of this period). If the Commission is inclined to grant this Motion, Aquila asks that it do so by October 15, 2004, so that a single filing may be made.

WHEREFORE, Aquila requests a Commission order consolidating Cases Nos. GR-2004-0539 and GR-2004-0538, with Case No. GR-2004-0539 being the lead case.

Respectfully submitted,



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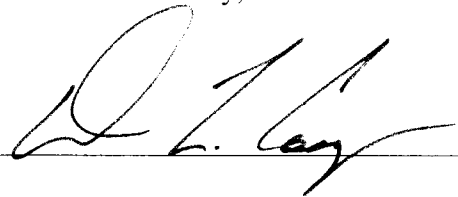
ATTORNEYS FOR AQUILA, INC.

## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail October 7, 2004, to the following:

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