

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

In the Matter of the Application of Aquila, Inc., for)	
Approval of Its Experimental Regulatory Plan and for)	
a Certificate of Convenience and Necessity)	
Authorizing It to Participate in the Construction,)	
Ownership, Operation, Maintenance, Removal,)	
Replacement, Control and Management of a Steam)	Case No. EO-2005-0293
Electric Generating Station in Platte County, Missouri,)	
or Alternatively for an Order Specifically Confirming)	
That Aquila, Inc. Has the Requisite Authority under)	
Its Existing Certificate(s).)	

**Staff's Motion for Leave to Late-File
the Staff's Response to Aquila's Status Report**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its Motion for Leave to Late-File The Staff's Response to Aquila's Status Report states:

1. On June 29, 2005 the Commission issued an Order Directing Filing in which it ordered the parties to respond to Aquila, Inc.'s Status Report by July 6, 2005.
2. Due to the press of other matters, including those involving Aquila, Inc.—Aquila's pending rate increase and class cost-of-service / rate design cases (ER-2005-0436, HR-2005-0450 & EO-2002-384); Aquila's Chapter 100 financing case (EO-2005-0156)—the Staff did not file its response in this case on July 6, 2005.
3. It was not the Staff's intention to delay its filing in response to Aquila's Status Report in this case and one day's delay in its filing should prejudice no party. The Staff apologizes for any inconvenience this late-filing may have caused.

WHEREFORE, the Staff respectfully requests the Commission for leave to late-file its response to Aquila's Status Report.

Respectfully submitted,

DANA K. JOYCE
General Counsel

/s/ Nathan Williams

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Missouri Bar No. 35512

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 7th day of July 2005.

/s/ Nathan Williams