

AQUILA, INC.
CASE NO. EF-2003-0465
DATA REQUEST NO. OPC-1001

DATE OF REQUEST: May 14, 2003

DATE RECEIVED: May 14, 2003

DATE DUE: June 3, 2003

REQUESTOR: Ted Robertson

QUESTION:

Please provide copies of all data request/interrogatory questions received from the state of Iowa regulatory staff(s), and all other intervenors in Iowa, regarding Aquila's reorganization activities, and the encumbrance of Iowa assets. This is a continuing data request; please update your response on a weekly basis.

RESPONSE: Please find attached the responses to the Iowa Office of Public Counsel's (OCA) data requests No.'s 1 -17.

ATTACHMENT: Responses to OCA data requests No.'s 1-17

ANSWERED BY: Mark Reed

MAY 22 2003

Schedule TJR-16.1

AQUILA, INC.
CASE NO. SPU-03-7
DATA REQUEST NO. OCA-13

FILE COPY

DATE OF REQUEST: May 14, 2003
DATE RECEIVED: May 14, 2003
DATE DUE: May 19, 2003
REQUESTOR: John F. Dwyer
REFERENCE: Direct Testimony of Rick Dobson, Page 10, Line(s) 13-15

QUESTION:

Provide all research, analysis, work papers or any other support used to determine what portion of the \$250 million deemed to be needed to support the on-going working capital requirements of the domestic utility business is required for Iowa gas operations.

RESPONSE: We have estimated through an internal study and by reviewing the working capital facilities of similar utilities (see Exhibits RD-3 and RD-4 to Rick Dobson's testimony), that \$250 million of the total facility will likely be needed to support utility operations going forward. We did not attempt to "allocate" portions of it to each state operation.

ATTACHMENT: NA

ANSWERED BY: Mark Reed

MAY 22 2003