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

In the Matter of Tariff Revisions Filed by	)	
Aquila, Inc. d/b/a Aquila Networks – MPS and	)	Case No. EO-2007-0395
Aquila Networks - L&P Designed to Continue	)	
and Expand its Fixed Bill Pilot Program		

## MOTION FOR EXTENSION OF TIME TO FILE RECOMMENDATION

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and requests an extension, to July 23, 2007, of time to file its recommendation in this case. In support thereof, the Staff respectfully states as follows:

- 1. On April 13, 2007, Mr. Dennis O'Dell, Senior Director of Business Planning for Aquila, Inc. d/b/a Aquila Networks MPS and Aquila Networks L&P ("Aquila"), filed direct testimony supporting an extension of and changes to Aquila's Fixed Bill Pilot Program. The filing included proposed tariff sheets bearing an effective date of July 1, 2007.
- 2. On April 19, 2007, Aquila filed a motion requesting approval of the proposed tariff sheets. The motion asserts that that the pilot program "has been successfully offered on a limited basis by Aquila and it represents a product that is valued by certain residential customers."
- 3. On April 23, 2007, the Commission issued an Order directing the Staff to file a recommendation no later than June 21, 2007.
- 4. In a letter to Ms. Colleen Dale, Secretary/Chief Regulatory Law Judge, dated June 15, 2007, counsel for Aquila requested an extension of the effective date of the proposed tariff sheets to August 1, 2007.

5. The Staff welcomes the extension in the effective date because, owing to the press of other business and the uniqueness of the Fixed Bill Program, the Staff needs additional time to properly evaluate the merits of Aquila's proposal.

WHEREFORE, the Staff respectfully requests that the Commission grant the Staff an extension, to July 23, 2007, of the time to file its recommendation in this proceeding.

Respectfully submitted,

## /s/ Dennis L. Frey

Dennis L. Frey Senior Counsel Missouri Bar No. 44697

Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360
Jefferson City, MO 65102
(573) 751-8700 (Telephone)
(573) 751-9285 (Fax)
denny.frey @psc.mo.gov

## **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 20<sup>th</sup> day of June 2007.

/s/ Dennis L. Frey