

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

The Office of the Public Counsel,)	
)	
Complainant,)	
)	
v.)	<u>Case No. EC-2006-</u>
)	
Aquila, Inc., d/b/a Aquila Networks – MPS)	
and Aquila Networks – L&P)	
)	
Respondent.)	

AFFIDAVIT OF TED ROBERTSON

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

1. My name is Ted Robertson. I am a Public Utility Accountant III employed by the Missouri Office of the Public Counsel.
2. Aquila Networks – MPS Financial Accounting Standards No. 106 funding responsibility began with the effective date of rates (i.e., 3/1/98) in Missouri Public Service d/b/a UtiliCorp United, Case No. ER-97-394.
3. Aquila Networks – L&P Accounting Standards No. 106 funding responsibility started with Aquila, Inc.'s acquisition of the former St. Joseph Light & Power Company in UtiliCorp United and St. Joseph Light & Power, Case No. EM-2000-292, effective January 1, 2001.
4. For year 1998, the Aquila Networks - MPS Accounting Standards No. 106 funding was excessive by \$38,933. For years 1999, 2000, 2001 and 2002, the funding was deficient by \$15,428, \$62,239, \$60,951 and \$26,208, respectively. For years 2003, 2004 and 2005, the funding level provided was zero thus, the deficiency equaled the entire annual expense amount of \$609,953, \$943,587 and \$1,302,665, respectively.
5. Aquila Networks - MPS Financial Accounting Standards No. 106 funding deficiency totals \$2,982,099 for the period 1998 through 2005.

6. For years 2001 and 2002, the Aquila Networks - L&P Accounting Standards No. 106 funding was deficient by \$1,819,392 and \$7,370, respectively. For years 2003, 2004 and 2005, the funding level provided was zero thus, the deficiency equaled the entire annual expense amount of \$766,327, \$1,191,188 and \$1,698,785, respectively.

7. Aquila Networks - L&P Financial Accounting Standards No. 106 funding deficiency totals \$5,483,062 for the period 2001 through 2005.

8. The total Aquila Networks - MPS and Aquila Networks - L&P Financial Accounting Standards No. 106 funding deficiency is \$8,465,161.

9. The normal procedure for funding the Aquila Networks - MPS and Aquila Networks - L&P Financial Accounting Standards No. 106 costs on a yearly basis is to submit a 1st payment to the outside fund at the time the actuary report is provided, usually mid-year, and then a 2nd and 3rd payment during the third and fourth quarters of each year.

10. I hereby swear and affirm that my statements are true and correct to the best of my knowledge and belief.



Ted Robertson, C.P.A.
Public Utility Accountant III

Subscribed and sworn to me this 14th day of October 2005.

KATHLEEN HARRISON
Notary Public - State of Missouri
County of Cole
My Commission Expires Jan. 31, 2006



Kathleen Harrison
Notary Public

My commission expires January 31, 2006.