

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

In the Matter of the Application of Aquila, Inc.)	
for Permission and Approval and a Certificate)	
of Public Convenience and Necessity)	
Authorizing it to Acquire, Construct, Install,)	Case No. EA-2006-0309
Own, Operate, Maintain, and otherwise Control)	
and Manage Electrical Production and Related)	
Facilities in Unincorporated Areas of Cass)	
County, Missouri Near the Town of Peculiar.)	

**APPLICATION OF SOUTHWEST POWER POOL, INC.
TO INTERVENE**

COMES NOW Southwest Power Pool, Inc. ("SPP") by and through its counsel and pursuant to 4 CSR 240-2.075 applies to intervene in the above-entitled matter. In support of its application, SPP states as follows:

1. SPP is a not-for-profit corporation, organized and existing under the laws of the state of Arkansas with its principle place of business at 415 North McKinley, Suite 140, Little Rock, Arkansas, 72205.

2. SPP is now functioning and has functioned, since 1968, as a Regional Reliability Council and is a member of the North American Electric Reliability Council ("NERC"). In 1998, SPP filed an open access transmission tariff with the Federal Energy Regulatory Commission ("FERC"). SPP now provides transmission service across the SPP region under the terms of that tariff which was approved by the FERC. Subsequently, the FERC granted SPP RTO status pursuant to a series of orders terminating with an October 1, 2004 order that contained certain limited compliance issues that have now been addressed. SPP currently has forty-six (46) members. A list of SPP's members is attached hereto as Exhibit 1.

3. On January 25, 2006, Aquila, Inc. ("Aquila") filed an application requesting the Commission grant it a certificate of public convenience and necessity for the South Harper generating facility and associated substations.

4. SPP functions as Aquila's NERC sanctioned Regional Reliability Coordinator. In addition, SPP functions as the Transmission Provider for Aquila's Transmission Facilities under SPP's OATT. As the Regional Reliability Coordinator and the Transmission Provider for transmission service in the region of the State of Missouri for which Aquila now serves retail electric service, SPP has an interest which is different from that of the general public and which may be adversely affected by a final order arising from this case.

5. As a Regional Reliability Coordinator and the Transmission Provider, SPP is very familiar with the reliability of the transmission system in the region and how system modifications will affect the reliability of the transmission system. SPP can provide that input to the Commission to inform its determination. For that reason, granting SPP's intervention will serve the public interest.

6. Pursuant to 4 CSR 240-2.075(2), SPP states that it supports Aquila's application.

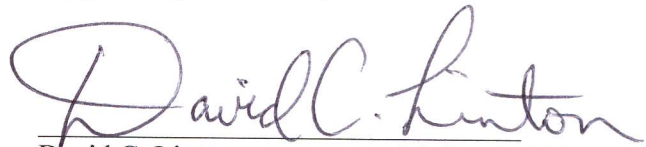
7. Communications in this matter should be directed to:

David C. Linton
David C. Linton, L.L.C.
424 Summer Top Lane
Fenton, Missouri 63026
(636) 349-9028
djlinton@earthlink.net

Patrick Bourne
Director, Transmission Policy
Southwest Power Pool, Inc.
415 North McKinley
Little Rock, Arkansas 72205
(501) 614-3249
pbourne@SPP.ORG

Wherefore, for the foregoing reasons, SPP respectfully requests permission to
intervene in the above-entitled matter.

Respectfully submitted,

A handwritten signature in purple ink that reads "David C. Linton". The signature is fluid and cursive, with the first name "David" being the most prominent.

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Attorney for Southwest Power Pool, Inc.

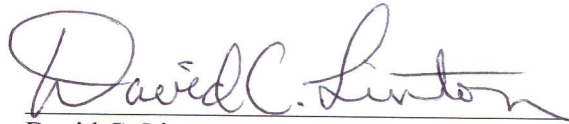
Dated: 2-27-06

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing application of the Southwest Power Pool, Inc. to Intervene was e-mailed, on the 27th day of February, 2006, to the following:

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David C. Linton

Dated: February 27, 2006

SPP Members

Investor-Owned

American Electric Power #
 Public Service Company of Oklahoma
 Southwestern Electric Power Company
Aquila, Inc.
 Missouri Public Service #
 *St. Joseph Light & Power **
 WestPlains Energy #
Cleco Power LLC #
Entergy Services, Inc. *
Exelon Power Team *
Kansas City Power & Light Company #
OG&E Electric Services #
Southwestern Public Service Company #
The Empire District Electric Company #
Westar Energy, Inc. #
 Kansas Gas and Electric Company

Cooperatives

Arkansas Electric Cooperative Corporation *
East Texas Electric Cooperative, Inc. *
Kansas Electric Power Cooperative
Midwest Energy, Inc. *
Northeast Texas Electric Cooperative *
Rayburn Country Electric Cooperative, Inc. *
Sunflower Electric Power Corporation # *
Tex-La Cooperative of Texas, Inc. *
Western Farmers Electric Cooperative #

Municipals

City of Clarksdale, Mississippi *
City of Lafayette, Louisiana # *
City Power & Light, Independence, Missouri # *
City Utilities, Springfield, Missouri *
Oklahoma Municipal Power Authority
Public Service Comm. of Yazoo City, Mississippi *
The Board of Public Utilities, Kansas City, Kansas # *

State Agencies

Grand River Dam Authority #
Louisiana Energy & Power Authority #

Independent Power Producer

Calpine Energy Services, L.P. *
Redbud Energy, L.P. *
Tenaska Power Services Company *

Marketers

Aquila Power - Aquila, Inc. *
Cargill Power Markets, LLC *
Cinergy Corporation *
Constellation Energy Commodities Group, Inc. *
Coral Power LLC *
Dynergy Marketing & Trade *
Duke Energy Trading & Marketing *
Edison Mission Marketing & Trading, Inc. *
El Paso Merchant Energy, L.P. *
NRG Power Marketing, Inc. *
TXU Energy Trading Company
Williams Power Company, Inc. *

SPP Contract Participants

Southwestern Power Administration

Statistics

13	Investor-Owned
9	Cooperatives
7	Municipals
2	State Agencies
3	Independent Power Producer
12	Marketers
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46	Members as of 1/16/2006

* Transmission Dependent Member

Denotes Control Areas within SPP