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December 28, 2007

Ms. Colleen Dale Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

#### RE: Aquila, Inc.

Dear Ms. Dale:

In accordance with 4 CSR 240-20.090(4), on behalf of Aquila, Inc., d/b/a Aquila Networks-MPS and Aquila Networks-L&P ("Aquila" or "Company"), I am herewith providing to the Missouri Public Service Commission ("Commission"), for filing in electronic form, proposed rate schedules to adjust charges related to the Company's approved Fuel Adjustment Clause ("FAC"). The schedules are designed to increase FAC-related charges for Aquila's MPS division by approximately \$13.2 million and for its L&P division by approximately \$3.5 million. The rate schedules bear an issue date of December 28, 2007, and an effective date of March 1, 2008.

As explained in the direct testimony and supporting schedules of Dennis R. Williams, Aquila's Vice President-Electric Regulatory Services, which is being filed in support of the proposed rate schedules, the major factors that have caused the proposed increases in FAC-related charges are: 1) higher purchased power costs; 2) higher gas costs, including hedging expenses; and 3) higher coal and freight costs. Although these costs have increased since Aquila's last general rate case, the increases have been lower than projected.

Also provided in electronic form are schedules containing all of the information required by 4 CSR 240-3.161(7); all workpapers that support the proposed rate schedules; and copies of the Surveillance Monitoring Report for each of Aquila's operating divisions for the quarter ended September 2007, which is the most recent quarter for which financial data are available.

Finally, contemporaneously with, and in addition to, the various materials described above Aquila is filing a Motion for Waiver, which seeks a waiver from the Commission of certain of the filing deadlines prescribed in 4 CSR 240-3.161(5), and also a Motion for Protective Order.

Page 2 of 2 December 28, 2007

Copies of Aquila's proposed FAC-related rate schedules, all supporting materials described in this letter, including workpapers, and the Motion for Waiver will be served electronically, this date, on the Commission's General Counsel, the Office of the Public Counsel, and on each party to the Company's last general rate case, Case No. ER-2007-0004.

Please bring this filing to the attention of the appropriate Commission personnel and see that a copy of all correspondence, notices, orders, and other communications that relate to Aquila's filing are furnished to Dennis R. Williams, Vice President-Electric Regulatory Services, Aquila, Inc., 20 W. Ninth Street, Kansas City, Missouri 64105, <u>denny.williams@aquila.com</u>, and also to the undersigned counsel.

Thank you for your assistance.

Sincerely

L. Russell Mitten ATTORNEY FOR AQUILA, INC.

cc: Office of the General Counsel Office of the Public Counsel All Parties to Case No. ER-2007-0004

#### STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

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P.S.C. MO. No.

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Revised Sheet No. <u>127</u> Original Sheet No. <u>127</u>

## Canceling P.S.C. MO. No. Aquila, Inc., dba

AQUILA NETWORKS For All Territory Served by Aquila Networks – L&P and Aquila Networks – MPS KANSAS CITY, MO 64138

FUEL ADJUSTMENT CLAUSE (CONTINUED) ELECTRIC

#### COST ADJUSTMENT FACTOR

Aquila Networks – L&P		Total		Secondary		Primary
Accumulation Period Ending		11/30/07				
1 Total energy cost (F, P, and E)		\$22,743,474				
2 Base energy cost (B)	-	\$19,331,734				
3 First Interim Total		\$3,411,740				
4 Base energy (S <sub>A</sub> ) by voltage level				900,909,146		173,673,048
4.1 Loss factors (L)			*	108.443%	*	106.231%
4.2 S <sub>A</sub> adjusted for losses				976,974,420		184,495,165
4.3 Loss factor weights			*	84.115%	*	15.885%
5 Customer Responsibility	*	95%				
6 Second Interim Total by voltage level		\$3,241,153		\$2,726,308		\$514,845
7 Adjustment for Under / Over recovery for			ŧ	\$0	±	\$0
prior periods (C)						
8 Fuel Adjustment Clause				\$2,779,289		\$525,059
9 Estimated recovery period sales kWh (S <sub>R</sub> )			÷	1,811,608,578	÷	349,233,422
10 Current period cost adjustment factor				\$0.0015		\$0.0015
11 Previous period cost adjustment factor			+	\$0.0000	+	\$0.0000
12 Current annual cost adjustment factor				\$0.0015		\$0.0015

	Aquila Networks – MPS		Total		Secondary		Primary
Ac	cumulation Period Ending		11/30/07				
1	Total energy cost (F, P, and E)		\$95,066,349				
2	Base energy cost (B)	-	\$82,146,272				
3	First Interim Total		\$12,920,077				
4	Base energy (S <sub>A</sub> ) by voltage level				2,810,243,477		426,410,266
	4.1 Loss factors (L)			*	107.433%	*	104.187%
	4.2 S <sub>A</sub> adjusted for losses		-		3,019,127,877		444,263,899
	4.3 Loss factor weights			*	87.173%	*	12.827%
5	Customer Responsibility	*	95%				
6	Second Interim Total by voltage level		\$12,274,073		\$10,699,626		\$1,574,447
7	Adjustment for Under / Over recovery for			±	\$0	±	\$0
ļ	prior periods (C)						
8	Fuel Adjustment Clause	·			\$10,926,471		\$1,608,859
9	Estimated recovery period sales kWh (S <sub>R</sub> )			÷	5,331,039,560	+	808,901,440
10	Current period cost adjustment factor				\$0.0020		\$0.0020
11	Previous period cost adjustment factor			+	\$0.0000	+	\$0.0000
	Current annual cost adjustment factor				\$0.0020		\$0.0020

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Issued: <u>December 28, 2007</u> Issued by: Gary Clemens, Regulatory Services

Effective: March 1, 2008,

Exhibit No.: Issues: Fuel Adjustment Clause Witness: Dennis R. Williams Sponsoring Party: Aquila Networks-MPS & L&P Case No.:

#### Before the Public Service Commission of the State of Missouri

Direct Testimony

of

Dennis R. Williams

#### TABLE OF CONTENTS DIRECT TESTIMONY OF DENNIS R. WILLIAMS ON BEHALF OF AQUILA, INC. D/B/A AQUILA NETWORKS-MPS AND AQUILA NETWORKS-L&P CASE NO. \_\_\_\_\_

INTRODUCTION AND QUALIFICATIONS1
EXECUTIVE SUMMARY2
THE PROPOSED FAC RATE ADJUSTMENT4

Direct Testimony: Dennis R. Williams

#### BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI DIRECT TESTIMONY OF DENNIS R. WILLIAMS ON BEHALF OF AQUILA, INC. D/B/A AQUILA NETWORKS-MPS AND AQUILA NETWORKS-L&P CASE NO. \_\_\_\_\_

1		INTRODUCTION AND QUALIFICATIONS
2	Q.	Please state your name and business address.
3	A.	My name is Dennis Williams, and my business address is 20 W. Ninth Street,
4		Kansas City, Missouri 64105.
5	Q.	By whom are you employed and what is your job title and what are your job
6		responsibilities?
7	A.	I am employed by Aquila, Inc. ("Aquila" or "Company") as Vice President -
8		Electric Regulatory Services.
9	Q.	Please briefly describe your education and work experience.
10	A.	I graduated with honors in 1974 from Central Missouri State University, receiving
11		a Bachelor of Science in Business Administration degree, with majors in
12		accounting and finance. After graduation, I was licensed in Missouri as a
13		Certified Public Accountant and employed as an auditor in the regulated
14		industries division of Arthur Andersen & Company. After leaving that company,
15		I was employed for five years with a regulatory consulting firm. Since 1986, I
16		have been employed by Aquila in various capacities.
17	Q.	What is the purpose of your testimony?
18	А.	My testimony supports the rate schedules that have been filed by Aquila to adjust
19		rates for prudently-incurred increases in fuel and purchased power costs that the

Direct Testimony: Dennis R. Williams

1		Company has experienced during the six-month period June through November
2		2007. This six-month period is the initial Accumulation Period specified in
3		Aquila's Fuel Adjustment Clause ("FAC") that was approved by the Missouri
4		Public Service Commission ("Commission") in June of this year in its Report and
5		Order issued in Case No. ER-2007-0004.
6		EXECUTIVE SUMMARY
7	Q.	Please provide an overview of your testimony in support of the rate schedules
8		filed by Aquila.
9	А.	The Commission's rule governing fuel and purchased power cost recovery
10		mechanisms for electric utilities - specifically 4 CSR 240-20.090(4) - requires
11		Aquila to make periodic filings to allow the Commission to review the actual fuel
12		and purchased power costs the Company has incurred and to allow rates to be
13		adjusted, either up or down, to reflect those actual costs. Aquila's approved FAC
14		calls for two annual filings: an initial filing covering the six-month Accumulation
15		Period running from June through November and a second filing covering the
16		Accumulation Period running from December through May. Any increases or
17		decreases in rates that are approved by the Commission, or that take effect by
18		operation of law, are then collected from or refunded to customers over two
19		twelve-month Recovery Periods: March through February for the initial
20		Accumulation Period and September through August for the second
21		Accumulation Period.
22		Since the conclusion of Aquila's last rate case, the variable costs of fuel and

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purchased power necessary to meet the demand for electricity by the Company's

1 customers has continued to increase. For the Accumulation Period June through 2 November 2007, Aquila's actual variable fuel and purchased power costs, 3 including carrying costs, have exceeded the costs included in base rates in Case 4 No. ER-2007-0004 by approximately \$13.2 million for its Missouri Public Service ("MPS") division and \$3.5 million for its St. Joseph Light and Power 5 6 division ("L&P"). According to Aquila's tariff, Aquila absorbs 5% of increased 7 variable fuel and purchased power costs. Therefore, in accordance with the Commission's rule and Aquila's approved FAC, the Company has filed rate 8 9 schedules that provide for an increase in rates to recover cost increases of approximately \$12.5 million from its MPS customers and \$3.3 million from its 10 11 L&P customers. As reflected in the rate schedules filed by the Company, Aquila has developed a Cost Adjustment Factor ("CAF") of \$0.0020 for MPS and 12 13 \$0.0015 for L&P. This will allow Aquila to collect the difference between base 14 costs of fuel and purchased power and the costs that actually were incurred during 15 the June-November Accumulation period over a Recovery Period running from 16 March 2008 through February 2009.

My testimony also notes the two safeguards that have been built into Aquila's FAC and the Commission's rules to ensure that the Company does not collect from customers more than its actual, prudently-incurred fuel and purchased power costs. The first is a true-up process that ensures that collections through the CAF during the Recovery Period do not exceed actual fuel and purchased power costs. The second is the requirement that the Company's purchases of fuel and

1		purchased power be subjected to periodic Prudence Reviews, which will ensure
2		that only prudently-incurred costs are passed through to customers.
3		THE PROPOSED FAC RATE ADJUSTMENT
4	Q.	Please explain the reasons that Aquila has filed FAC-related rate schedules at this
5		time?
6	A.	The Commission's rules – specifically 4 CSR 240-20.090(4) – and Aquila's FAC
7		require the Company to periodically make filings to allow the Commission to
8		review Aquila's actual fuel and purchased power costs and to allow rates to be
9		increased or decreased based on 95% of the difference between base energy costs
10		and the fuel and purchased power costs that the Company actually incurred during
11		the applicable Accumulation Period. Aquila's approved FAC calls for two annual
12		filings: an initial filing covering the six-month Accumulation Period running from
13		June through November 2007 and a second filing covering the Accumulation
14		Period running from December 2007 through May 2008. The rate schedules to
15		which my testimony relates are Aquila's initial filing under the FAC that was
16		approved by the Commission in June of this year. By its filing, the Company
17		seeks to increase rates to reflect 95% of the difference between the base amount
18		of fuel and purchased power costs and Aquila's actual expenditures for energy for
19		the period June through November 2007. As provided in the Company's FAC,
20		these cost increases will be collected from customers over the twelve-month
21		Recovery Period running from March 2008 through February 2009.
22	Q.	Have Aquila's fuel and purchased power costs increased since the Commission
23		issued its Report and Order in Case No. ER-2007-0004?

Direct Testimony: Dennis R. Williams

1	A.	Yes. Aquila's fuel and purchased power costs have increased, which is the reason
2		why the rate schedules filed by the Company seek to increase rates charged to
3		customers.
4	Q.	Please briefly describe the reasons for those increases.
5	A.	A number of factors caused these cost increases. These factors included the
6		following:
7		• Higher cost of purchased power
8		• Higher cost of gas including hedging expenses; and
9		• Higher cost of coal and freight
10	Q.	What is the expected monthly dollar increase for a typical residential customer's
11		electric bill?
12	A.	For customers using 1,000 kWh per month in the MPS territory the bill will
13		increase approximately \$2.00 per month and in the L&P territory the bill will
14		increase about \$1.50 per month.
15	Q.	Were these increases in line with expectations?
16	А.	They were actually lower than what had been projected. The testimony in Case
17		No. ER-2007-0004, I provided historical evidence that variable fuel and
18		purchased power costs had increased on average approximately \$35 million in
19		each of the past three years. Approximately 70% of these costs are typically
20		incurred during the months of June through November. Our forecasts reflected
21		expectations of similar increases in 2007, most of which were expected to take
22		place during the peak summer months. However, Aquila was able to negotiate

- lower than anticipated purchase power rates to meet our peaking needs this
   summer.
- Q. Do you expect similar variable fuel and purchased power cost increases during the
  next Accumulation Period from December 2007 through May 2008?

5 A. No. Barring unforeseen circumstances, Aquila expects net variable fuel and 6 purchased power cost increases to be negligible during that period. The 7 December through May period is not one of peak energy consumption that can 8 drive purchased power costs upward. Moreover, Aquila has been successful in 9 renegotiating an existing coal contract, which is expected to generate \$7 million 10 in annual savings beginning in 2008.

11 Q. Do you believe the design of Aquila's fuel adjustment mechanism is appropriate?

12 Yes. The design was the subject of much discussion and debate prior to being A. approved in the Commission's Order in Case No. ER-2007-0004. Aquila is not 13 opposed to reasonable changes in the design of its fuel adjustment mechanism but 14 15 believes that if changes are made they should be done so in the context of its next base rate case, which will likely be filed in mid-2008. For example, the FAC six 16 month time periods were set in a manner that creates the potential for a significant 17 under-recovery during the June-November filing period (i.e. all of the summer 18 19 months) and a flat to potential over-recovery during the December-May filing 20 period. This lack of symmetrical impact could be potentially mitigated by shifting 21 the composition of the filing periods.

Q. In Case No. ER-2007-0004 there was an issue regarding the C.W. Mining coal
contract court case. Do you have an update on this issue?

1	А.	Yes. The Utah federal district court issued an order in Aquila's favor. The court
2		ordered C.W. Mining to pay Aquila \$24.8 million. Per the stipulation in Case No.
3		ER-2007-0004, Aquila agreed to return to customers ninety-five percent of any
4		monetary recovery net of fees and expenses through the FAC, including those
5		associated with collecting the awarded damages from C.W. Mining. Aquila may
6		collect some or all of this judgment in 2008, and if that occurs, will pass through
7		95% of the net proceeds received in its next FAC filing.

8 Q. Did Aquila consider including some of the awarded damages in this filing?

9 A. Yes. Aquila considered accruing a portion of the recovery that it was awarded so
10 that it would pass through the current FAC. However, C.W. Mining's financial
11 status is uncertain and there is substantial concern that a large portion of their
12 obligation to Aquila may not be paid. Without specific knowledge of the form,
13 amount or timing of any ultimate recovery from C.W. Mining, Aquila's outside
14 auditors did not believe that this accounting treatment would have been
15 appropriate.

- Q. How is Aquila proposing to recover the cost increases the Company experienced
   during the June-November 2007Accumulation Period?
- A. The rate schedules filed by Aquila propose to recover the fuel and purchased
  power cost increases actually incurred during the June-November Accumulation
  Period by applying a Cost Adjustment Factor ("CAF") of \$0.0020 for MPS and
  \$0.0015 for L&P to estimated kWh sales during the March 2008-February 2009
  Recovery Period. The proposed CAF was calculated in the manner specified in
  the Company's FAC. I have attached to my testimony as Schedule DRW-1 a copy

1		of the tariff sheets that contain and explain the formula that Aquila used to
2		calculate the CAF that is included in the proposed rate schedules. This formula
3		was approved by the Commission in Case No. ER-2007-0004.
4	Q.	The tariff has separate CAF rates for primary and secondary voltage levels. Why
5		are these rates the same as shown on the Schedule DRW-1?
6	A.	The rates are only carried out to four decimal places. The rates when rounded to
7		four decimal places are the same.
8	Q.	How did you develop the various values used to derive the proposed CAF that are
9		shown on Schedule DRW-1?
10	А.	The data upon which Aquila based the values for each of the variables in the
11		approved CAF formula are included on that schedule. The schedule contains all
12		of the information that is required by 4 CSR 240-3.161(7)(A). In addition, as
13		required by 4 CSR 240-3.161(7)(B), I have separately provided to all parties of
14		record in Case No. ER-2007-0004 the accounting work-papers that support the
15		data contained in Schedule DRW-1.
16	Q.	If the rate schedules filed by Aquila are approved, what safeguards exist to ensure
17		that the revenues the Company collects do not exceed the fuel and purchased
18		power costs that Aquila actually incurred during the Accumulation Period?
19	A.	Aquila's FAC and the Commission's rules provide two mechanisms to ensure that
20		amounts collected from customers do not exceed Aquila's actual, prudently-
21		incurred fuel and purchased power costs. First, at the end of each Recovery Period
22		the Company is required to true-up the amounts collected from customers through
23		the CAF with the excess fuel and purchased power costs that actually were

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1 incurred during the Accumulation Period to which the CAF applies. Second, 2 Aquila's fuel and purchased power costs also will be subjected to periodic 3 Prudence Reviews to ensure that only prudently-incurred fuel and purchased 4 power costs are collected from customers through Aquila's FAC. These two mechanisms serve as checks that ensure that the Company's customers pay only 5 the prudently-incurred, actual costs of fuel and purchased power used to provide 6 7 electric service (less the 5% Aquila is absorbing) – no more and no less. This is 8 precisely the result that the Missouri General Assembly sought to achieve when it 9 enacted into law Section 386.266, RSMo.

Q. What action is Aquila requesting from the Commission with respect to the rateschedules that the Company has filed?

12 A. As provided by 4 CSR 240-20.090(4), Staff has thirty (30) days from the date the rate schedules are filed to conduct a review and to make a recommendation to the 13 Commission as to whether the rate schedules comply with the Commission's 14 15 rules, the requirements of Section 386.266, RSMo, and the Company's approved FAC. The Commission has sixty (60) days from the date of Aquila's filing to 16 either approve the rate schedules or to allow them to take effect by operation of 17 law. Because the Company believes its filing satisfies all of the requirements of 18 19 applicable statutes, the Commission's rules, and Aquila's approved FAC, the 20 Company requests that, following Staff's review, the Commission approve the 21 rate schedules to be effective as of March 1, 2008, which is the first day of the 22 Recovery Period prescribed in Aquila's tariff.

23 Q. Does this conclude your testimony at this time?

Direct Testimony: Dennis R. Williams

1 A. Yes, it does.

#### STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

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P.S.C. MO. No.

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Revised Sheet No. <u>127</u> Original Sheet No. <u>127</u>

Canceling P.S.C. MO. No. \_\_\_\_\_

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Aquila, Inc., dba AQUILA NETWORKS For All Territory Served by Aquila Networks – L&P and Aquila Networks – MPS

### KANSAS CITY, MO 64138

FUEL ADJUSTMENT CLAUSE (CONTINUED) ELECTRIC

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12	Current annual cost adjustment factor				\$0.0015		\$0.0015

	Aquila Networks – MPS		Total		Secondary		Primary
Acci	umulation Period Ending		11/30/07				
1 -	Total energy cost (F, P, and E)		\$95,066,349				
2 1	Base energy cost (B)	1	\$82,146,272				
3	First Interim Total		\$12,920,077				
4	Base energy (S <sub>A</sub> ) by voltage level				2,810,243,477		426,410,266
4	4.1 Loss factors (L)			*	107.433%	*	104.187%
4	4.2 S <sub>A</sub> adjusted for losses				3,019,127,877		444,263,899
	4.3 Loss factor weights			*	87.173%	*	12.827%
5 (	Customer Responsibility	*	95%				
6	Second Interim Total by voltage level		\$12,274,073		\$10,699,626		\$1,574,447
	Adjustment for Under / Over recovery for			±	\$0	Ħ	\$0
	prior periods (C)						
8	Fuel Adjustment Clause				\$10,926,471		\$1,608,859
9	Estimated recovery period sales kWh (S <sub>R</sub> )			÷	5,331,039,560	÷	808,901,440
10	Current period cost adjustment factor				\$0.0020		\$0.0020
11	Previous period cost adjustment factor			+	\$0.0000	+	\$0.0000
12	Current annual cost adjustment factor				\$0.0020		\$0.0020

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

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In the matter of Aquila, Inc. d/b/a Aquila Networks-MPS and Aquila Networks-L&P, for authority to file FAC tariffs increasing electric rates for the service provided to customers in the Aquila Networks-MPS and Aquila Networks-L&P area

Case No.

County of Jackson ) ) ss State of Missouri )

#### AFFIDAVIT OF DENNIS R. WILLIAMS

Dennis R. Williams, being first duly sworn, deposes and says that he is the witness who sponsors the accompanying testimony entitled "Direct Testimony of Dennis R. Williams;" that said testimony was prepared by him and under his direction and supervision; that if inquiries were made as to the facts in said testimony and schedules, he would respond as therein set forth; and that the aforesaid testimony and schedules are true and correct to the best of his knowledge, information, and belief.

RUTIS

Dennis R. Williams

Subscribed and sworn to before me this 28 thay of \_

ecentres 2007. otary Public ferry D. Lutes

My Commission expires:

8-20-2008



TERRY D. LUTES Jackson County My Commission Expires August 29, 2008

## INFORMATION REQUIRED BY 4 CSR 240-3.161(7)

Energy Sales in KWh by rate class by voltage level

June- Nov - MPS Base energy (Sa) by voltage level	<u>Total</u> 3,236,653,743	<u>Secondary</u> 2,810,243,477	<u>Primary</u> 426,410,266				
June- Nov - L&P Base energy (Sa) by voltage level	1,074,582,194	900,909,146	173,673,048	1000			
Rate class MPS	Jun - Nov 07 KWH Billed	Jun-07 KWH Billed	Jul-07 KWH Billed	Aug-07 KWH Billed	Sep-07 KWH Billed	Oct-07 KWH Billed	Nov-07 KWH Billed
Residential	1,503,945,749	214,077,622	275,166,391	334,745,140	316,740,227	199,125,860	164,090,509
Commercial	1,073,090,804	175,503,341	182.050.548	202,521,290	199,332,677	167,955,130	145,727,818
Industrial	406,326,833	68,583,801	66,441,745	71,162,910	71.020,696	64,996,217	64,121,464
Gov't-Other	236,858,066	39,581,729	30,501,561	52,939,250	44,561,330	37,395,219	31,878,977
Total CIS+	3,220,221,452	497,746,493	554,160,245	661,368,590	631,654,930	469,472,426	405,818,768
Wholesale	16,432,291	2,434,131	2,995,860	3,606,740	2,902,940	2,264,720	2,227,900
Total	3,236,653,743	500,180,624	557,156,105	664,975,330	634,557,870	471,737,146	408,046,668
	Jun - Nov 07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07
Rate class L&P	KWH Billed	KWH Billed	KWH Billed	KWH Billed	KWH Billed	KWH Billed	KWH Billed
Residential	376,997,018	53,460,378	70,074,560	82,744,383	75,261,052	47,827,905	47,628,740
Commercial	384,584,932	63,959,737	57,987,457	78,302,562	69,297,037	59,189,861	55,848,278
Industrial	307,711,321	50,794,358	49,527,623	52,634,215	53,249,185	50,461,086	51,044,854
Gov't-Other	5,288,923	877,027	870,263	873,202	885,691	888,270	894,470
Total CIS+	1,074,582,194	169,091,500	178,459,903	214,554,362	198,692,965	158,367,122	155,416,342
Wholesale	-	0	0	0	0	0	0
Total	1,074,582,194	169,091,500	178,459,903	214,554,362	198,692,965	158,367,122	155,416,342

### 7(A)1.B

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The information required by this subsection contains information that is Highly Confidential or Proprietary and will be submitted as soon as the Commission issues an appropriate Protective Order.

PP costs included in fuel and PP costs with costs differentiated by

#### I. short and long term power contracts

MPS	J	un -Nov 07
Firm Long Term	•	
Nebraska Public Power District	\$	6,489,820
Union Power Partners	\$	11,724,101
Intercompany Purchases	\$	1,514,844
WPE/Gray County Wind	\$	1,590,125
Total Firm	\$	21,318,890
		· · · · · · · · · · · · · · · · · · ·
Non Firm Short Term	\$	22,945,415
Total Purchased Power Dollars	\$	44,264,305
L&P	J	un -Nov 07
Firm	•	4 000 000
Nebraska Public Power District	\$	4,692,006
	•	
Intercompany Purchases	\$	3,963,453
WPE/Gray County	\$	3,963,453 789,025
		3,963,453
WPE/Gray County Total Firm	\$	3,963,453 789,025 9,444,484
WPE/Gray County	\$	3,963,453 789,025

#### II On-Peak and Off Peak costs

Not Available

#### III Demand and Energy costs separately

Demand costs not included in the numbers above, all energy

## Market purchased MWH $% \left( {{\rm{A}}} \right)$ and costs included in PP costs

All purchases included in the fuel and purchased power costs are at Market See 7 (C)

Revenues from expenses associated with and MWH from off system sales

	Ju	n-Nov 2007
MPS:	•	
Off-System Sales (AC 447030 & 447035)	\$	25,758,016
Off-System Generation Cost (AC 501030, 547030)		1,230,309
Off-System Purchased Power Cost (AC 555030, 031, 035)		20,452,612
Net	\$	4,075,095
Off-System MWH Sales		334,570
<u>L&amp;P:</u>	<u> </u>	
Off-System Sales (AC 447030 & 447035)	\$	2,382,347
Off-System Generation Cost (AC 501030, 547030)		259,231
Off-System Purchased Power Cost (AC 555030, 031, 035)		652,602
Net	\$	1,470,514
Off-System MWH Sales		46,733

## Extraordinary costs

None

Base rate component of off-system sales

Off system sales in base rates was settled per ER-2007-0004 rate case.

Additional Requirements ordered by Commission

None

4. Base Energy by Voltage Level: CIS+ Secondary Customers CIS+ Primary Customers - MO939 CIS+ Primary Customers - MO945 CIS+ Primary Customers - MO946 CIS+ Primary Customers - MO947 Total CIS+ (CS5005Y) Total Wholesale Billings (Primary) Total kwh		Aquia Networks - L&P 6-months accumulation period ending: Variable Costs: (F) - 504100 Steam Transfer-Fuel (E) - 505000 Allowances (F) - 547000 Fuel (P) - 555001 Purchased Power (P) - 555001 Purchased Power (P) - 555101 Purchased Power (	Calculations of the proposed FAC collection Rates
Source 900,909,146 4,562,675 1,549,579 114,368,747 18,949,682 34,242,365 1,074,582,194 1,074,582,194	Input values Fixed values Calculations	Total           11/30/2007           \$ 13,485,881           \$ 13,485,881           \$ 13,485,881           \$ 13,485,881           \$ 1,822,702           \$ 1,822,702           \$ 1,822,702           \$ 1,822,702           \$ 1,822,702           \$ 1,822,702           \$ 1,822,702           \$ 1,822,702           \$ 1,825,858           \$ 1,535,658           \$ 19,31,734           \$ 3,241,153           \$ 3,241,153           \$ \$ 3,241,153           \$ \$ 3,241,553           \$ \$ 3,241,553           \$ \$ 3,241,553           \$ \$ 3,241,553           \$ \$ \$ 3,241,553	
сс 5000 СС 5000 СС 5000 СС 5000 СС 5000 СС 5000 СС 5000 5000 СС 5000 5000 5000 5000 5000 5000 5000 5000 5000 5000 5000 5000 5000 5000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 50000 5000000		Secondary 5 900,909,146 900,909,146 108,443% 976,974,43% 976,974,43% 976,974,43% 976,974,43% 976,974,43% 976,974,43% 976,974,43% 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146 976,974,146976,146 976,146,146976,146 976,146,146976,146 976,146,146976,146 976,146,146976,146 976,146,146976,146 976,146,146976,146,146976,146,146976,146,146976,146,146976,1460	
		Primary 11,830,376 11,830,376 116,231% 184,495,165 184,495,165 184,855% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,865% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855% 514,855\% 514,855\% 514,855\% 514,855\% 514,855\% 514,855\% 514,855\% 514,955\% 514,955\% 514,955\% 514,955\%514,955% 514,955\% 514,955\% 514,955\%515% 514,955\% 514,955\%516 515% 514,955\%516 515% 516 516\% 516\%517% 516\% 516\%517% 517% 517% 517% 517% 517% 517% 517%	

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4. Base Energy by Voltage Level: CIS+ Secondary Customers CIS+ Primary Customers - MO716 CIS+ Primary Customers - MO725 CIS+ Primary Customers - MO737 CIS+ Primary Customers - MO737		8 Interest (1) 9 Fuel Adjustment Clause 10 Estimated recovery period sales kWh (Sr) 11 Current period cost adjustment factor 12 Previous period cost adjustment factor 13 Current annual cost adjustment factor	<ul> <li>Second Interim Total by voltage level</li> <li>Adjustment for Under / Over recovery for microsoft (C)</li> </ul>	4.2 Sa adjusted for losses 4.3 Loss factor weights		<ul> <li>(r) 5-47-100 Fuel</li> <li>(F) - 547-101 Fuel</li> <li>(P) - 555000 Purchased Power</li> <li>(P) - 555001 Purchased Power</li> <li>(P) - 555101 Purchased Power</li> <li>1 Total energy cost (F,P and E)</li> <li>2a. Total MPS Sales kwh</li> <li>2b. Base Energy Rate</li> <li>2 Base energy cost (B) * \$0.02538</li> <li>3 First Interim Total</li> </ul>	Aquila Networks - MPS 6-months accumulation period ending: <u>Variable Costs:</u> (F) - 501000 Fuel (E) - 509000 Allowances
2,810,243,477 122,735 16,235,980 383,933,277 9,685,984	Input values Fixed values Calculations		95% \$ 12,274,073			\$ 4,619,968 \$ 4,619,968 \$ 44,096,312 \$ 1,703,651 \$ 295,066,349 \$ 3,236,653,749 \$ 3,236,653,749\\\$ 3,236,653,749\\\$ 3,236,653,749\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,236,759,759\\\$ 3,256,759\\\$ 3,256,759,759\\\$ 3,256,759,759\\\$ 3,256,759,759\\\$ 3,256,759,759\\\$ 3,256,759,759\\\$ 3,256,759,759\\\$ 3,256,759,759\\\$ 3,256,759,759\\\$ 3,256,759,759\\\$ 3,256,759,759\\\$ 3,256,759,759\\\$ 3,256,759,759\\\$ 3,256,759,759\\\$ 3,256,759,759\\\$ 3,256,759,759\\\$ 3,256,759,759\\\$ 3,256,759,759\\\$ 3,256,759,759,759	
		\$ 226,791 \$ \$ 10,926,417 \$ 5 331,039,560 \$ 0,00225 \$ \$ 0,00225 \$ \$ 0,00220 \$	10	3,019,127,877 87.173%	2,810,243,477 107.433%	69 	Secondary
		34,412 1,608,859 808,901,440 0.001989 0.0020	1,574,447	444,263,899 12.827%	426,410,266 104.187%	44,264,305	<u>Primary</u>

Total CIS+ (CS5005Y) Total Wholesale Billings (Primary) Total kwh

3,220,221,453 16,432,290 3,236,653,743

383,933,277 9,685,984

Calculation supporting the voltage change

Voltage differentiation was settled in case No. ER-2007-0004.

Calculations underlying any seasonal variation in the FAC collection rate

None

# WORKPAPERS

Total CIS+ (CS5005Y) Total Wholesale Billings (Primary) Total kwh	4. Base Energy by Voltage Level: CIS+ Secondary Customers CIS+ Primary Customers - M0716 CIS+ Primary Customers - M0725 CIS+ Primary Customers - M0737 CIS+ Primary Customers - M0737		<ul> <li>variable costs:</li> <li>(F) - 501000 Fuel</li> <li>(E) - 509000 Allowances</li> <li>(F) - 547000 Fuel</li> <li>(P) - 555001 Purchased Power</li> <li>(P) - 555001 Purchased Power</li> <li>(P) - 555101 Purchased Power</li> <li>(P) - 55500 Purchased Power</li> <li>(P) - 555101 Purchased Power</li> <li>(P) - 555101 Purchased Power</li> <li>(P) - 555101 Purchased Power</li> <li>(P) - 55501 Purchased Power</li> <li>(P) - 55501 Purchased Power</li> <li>(E) - 55501 Purchased Power</li> <li>(P) - 55501</li></ul>	Aquila Networks - MPS 6-months accumulation period ending:
3,220,221,453 16,432,290 3,236,653,743	2,810,243,477 122,735 16,235,980 383,933,277 9,685,984	Input values Fixed values Calculations	\$ 31,956,983 \$ 1,556,248 \$ 1,566,249 \$ 1,506,6349 3,226,653,743 \$ 0,02538 \$ 2,146,272 \$ 12,020,077 2,810,243,477 426,410,266 107,433% 104,187% 3,019,127,877 444,263,899 87,173% 12.827% 95% \$ 12,274,073 \$ 10,699,526 \$ 1,574,447 \$ 12,274,073 \$ 10,699,526 \$ 1,574,447 \$ 10,926,417 \$ 1,508,859 5,331,039,560 808,901,440 \$ 0,00205 \$ 0,00205 \$ 0,0020 \$ 0,0020	Total 11/30/2007 Secondary Primary












MISSOUR? PUBLIC SERVICE FAC BALANCE BY RECOVERY PERIOD & INTEREST CALCULATION

MonithY,STD,rete	CIM (Over)/Under Accrued CIM (Over)/Under Recovery CLIMM (Over)/Under Belance	OPEN ITEM=20082	Monthly STID rate C/M Accrued Interest CUMM Accrued Interest Balance Annual True-up	CVM (Over)/Under Accrued CVM (Over)/Under Recovery CUMM (Over)/Under Balance	4.2.14.14.2.19.0.19.0.19.0.19.14.2.14.2.14.2.14.2.14.2.14.2.14.2.1	OPEN ITEM=RTRF20081	OPEN ITEM BALANCE	Monthly STD Rate C/M Accrued Interest CUMM Accrued Interest Balance Annual True-up	CUMM (Over)/Under Balance	C/M (Over)/Under Accrued	OPEN ITEM=RTRF20072
							1,235,368	,	1,235,368	Jun-07 1,235,368	
							6,776,490	<ul> <li>0.54%</li> <li>6,681.00</li> <li>6,681</li> </ul>	6,769,809	Jul-07 5,534,441	
							15,480,482	0.58% 39,039.00 45,720	15,434,762	Aug-07 Sep 8,664,953 -1,998,6	Accomidali
							13,563,999	0.53% 82,190.00 127,910	13,436,089	-1,998,673	on nation
							12,631,553	0.50% 67,068.00 194,978	12,436,575	Oct-07 -999,514	
							12,467,331	0.53% 66,225.00 261,203	12,206,128	Nov-07 -230,447	ļ
			0	0	Dec-07			- 261,203	12,206,128	Dec-07	
			0 0	0	Jan-08			261,203	12,206,128	07 Jan-06	and become
			0 0	0	Accumulation period Feb-06 Mar			- 261,203	12,206,128 12,206,128	Feb-08	<b>↑</b>
			òo	o	-08			- 261,203 2	2,206,128 12,2	Mar-08	
			00	0	Apr-08 M			-	12,206,128 12,206,128	Apr-98 N	
		<b>_</b>	00	0	May-08 J			- 261,203 26	36,128 12,20	May-08 Ji	
0		Jun-08	00	0	Filing and Approval Jun-08 Jul-08			- 261,203 26	12,206,128 12,206,128 12,206,128 12,206,128 12,206,128 12,206,128 12,206,128 12,206,128	Jun-08 J	
00		Accum	00	0	Approval Iul-08 Au			- 261,203 261,203	6,128 12,206,	Jui-08 Au	Dato
00		Accumulation period	00	0	Aug-08 Sep-08			- ,203 261,203	,128 12,206,1	Aug-08 Sep-08	uary Pation
00			00	0	08 Oct-06			03 261,203	28 12,206,12	08 Oct-08	
		R Nov-DB		0	6 Nov-08			- 13 261,203	8 12,206,128	18 Nov-08	
00		Der	00	0	Dac-08			- 261,203	12,208,128	3 Dec-08	
00		Filing and Approval	00	0	Jan-09			- 261,203		Jan-09	
00	12,467,331 12,467,331 12,467,331 12,467,331 12,467,331			0	Recovery Period Feb-09 Ma			261,203 12,467,331 Added to Recovery Period 3	12,206,128	Feb-09	ļ
00	467,331 12	Maring	00	o	¥7-09			ied to Recove			
00		4nr.09	00	o	Apr-09			ry Period 3			
00	,467,331 12,46	Maurito	00	0	May-09 Ju						
00	57,331 12,467,		00	0	Jun-09 Jul-09						
00	331 12,467,331		00	0	09 Aug-09						
00	31 12,467,331	/ Period		0	ω.						
00	12,467,331	Define	0 0 Added to next recovery Period								
00	12,467,331 12	North	d recovery Pe								
00	,467,331 12,46		riod								
0 0 0 12,467,331	37,331 12,467.3	Tion-00 lan-40 Eok-40									
<u> </u>	a d	<u>5</u> •									

# WORKPAPERS

4. Base Energy by Voltage Level: CIS+ Secondary Customers CIS+ Primary Customers - M0938 CIS+ Primary Customers - M0945 CIS+ Primary Customers - M0946 CIS+ Primary Customers - M0947 Total CIS+ (CS5005Y) Total Wholesale Billings (Primary) Total kwh		Aquila Networks - L&P         6-months accumulation period ending:         Variable Costs:         (F) - 501000 Fuel         (F) - 504100 Steam Transfer-Fuel         (E) - 509000 Allowances         (F) - 547000 Fuel         (P) - 555000 Purchased Power         (P) - 555101 Purchased Power         2. Total SJLP Sales kwh         2. Total SJLP Sales kwh         3. First Interim Total         4.1 Loss factors (Lvl)         5. Customer Responsibility
Bourse 900,909,146 4,562,675 11,549,579 114,368,747 18,949,682 34,242,365 11,074,582,194 1,074,582,194	Input values Fixed values Calculations	$ \begin{array}{c c c c c c c c c c c c c c c c c c c $













ST. JOSEPH LIGHT&POWER FAC BALANCE BY RECOVERY PERIOD & INTEREST CALCULATION

Monthly STD, rate C/M Accrued interest CUMM Accrued Interest Balance Annual True-up MonthlySTD rate CM Accrued interest CUMM Accrued Interest Balance Annual True-up CMI (Over)Under Accrued United 304,251 CMI (Over)Under Recovery 304,251 CUMI (Over)Under Balance 304,251 Monthly STD Rate C/M Accrued interest CUMM Accrued Interest Balance Annual True-up CCM (Over)/Under Accrued CCM (Over)/Under Recovery CUMM (Over)/Under Balance CM (Over)/Under Accrued CM (Over)/Under Recovery CUMM (Over)/Under Balance OPEN ITEM=20082 OPEN ITEM=20081 G/L OPEN ITEM BALANCE Difference OPEN ITEM=20072 305,884.42 1,636,202.00 3,602,348.00 3,309,854.00 3,127,040.00 (1,643,42) - 83.00 0,54% 0 Jul-07 1,330,306 1,634,557 0.54% 1,645 1,645 Accumulation period Aug-07 Sep-07 1,956,720 (311,627) 3,592,922 0.58% 9,426 11,071 3,290,721 0.53% 19,132 30,204 Oct-07 (199,157) 3,110,697 0,50% 16,426 46,630 3,287,784 3,304,348 3,304,348 3,304,348 3,304,348 3,304,348 3,304,348 3,304,348 3,304,348 3,304,348 3,304,348 3,304,348 3,304,348 3,304,348 3,304,348 3,304,348 Nov-07 160,661 0.53% 16,564 63,194 Filing and Approval 
Dec-07 Jan-08 Feb-08 Mar-08 -63,194 63,194 63,194 63,194 Dec-07 Jan-08 Feb-08 Mar-08 -63,194 Apr-08 Apr-08 May-08 May-08 -63,194 63,194 1 Filing and Approval Jun-08 Jul-08 A Jun-08 Jul-08 Aug-08 Sep-08 Oct-08 Nov-08 Dec-08 30-nuC -63,194 Jul-08 Accumulation period Aug-08 Sep-08 -63,194 Aug-08 -63,194 Sep-08 0 0 Oct-08 Nov-08 Oct-08 63,194 63,194 63,194 63,194 prelimenaa **3,367,543** Added to Recovery Period 3 Nov-08 Filing and Approval Dec-08 Jan-09 F Dec-08 00 0 0 0 Jan-09 Jan-09 Feb-09 0 3,967,543 3,967,543 3,367,543 3,367,543 3,367,543 3,367,543 3,367,543 3,367,543 3,367,543 3,367,543 3,367,543 00 00 0 9 Feb-09 3,367,543 Recovery Period Feb-09 Mar-09 . . 00 0 Mar-09 00 00 Apr-09 Apr-09 00 May-09 May-09 Jun-09 00 00 Jun-89 Jul-09 Aug-09 Sep-09 Oct-09 00 0 0 3ul-09 Aug-09 00 00 ţ 00 0 0 ¢ 0 0 Added to next recovery Period 0 00 00 Nov-09 Dec-09 Jan-10 Feb-10 00 0 3,367,543

## MISSOURI PUBLIC SERVICE 12 Months Ended 9/30/07 Per Books (IN THOUSANDS OF DOLLARS) FINANCIAL SURVEILLANCE MONITORING REPORT RATE BASE AND RATE OF RETURN

Total Cor	npany Rate Base	Measurement Basis			onths Ended //30/20 <u>07</u>
Plant in S				-	
	Intangible	End of Period	251		
	Production - Steam	End of Period	370,411		
	Production - Other	End of Period	191,272		
	Transmission	End of Period	231,435		
	Distribution	End of Period	695,987		
	General	End of Period	124,660		
	Total Plant in Service			\$	1,614,018
Reserve f	or Depreciation				
	Intangible	End of Period	234		
	Production - Steam	End of Period	218,483		
	Production - Other	End of Period	36,397		
	Transmission	End of Period	74,552		
	Distribution	End of Period	257,837		
	General	End of Period	47,170		
	Total Reserve for Depreciation				634,672
Net Plant					979,346
Add					05 770
	Materials & Supplies	13 Mo Avg			25,778
	Cash	From prior rate case including offsets	CWC		(18,558)
	Fuel Inventory	13 Mo Avg	0,,0		27,322
	Prepayments	13 Mo Avg			2,105
	Other Regulatory Assets	End of Period			4,371
	Other Regulatory Roberts				1,011
Less					
	Customer Deposits	13 Mo Avg			(4,848)
	Customer Advances	13 Mo Avg			(9,547)
	Accumulated Deferred Income Taxes	End of Period			(108,288)
	Other Regulatory Liabilities	End of Period			(2,724)
Other Iter	ns from Prior Rate Case	Per Rate Case method			<u> </u>
Total Rat	e Base			\$	894,958
Net Oper	ating Income				58,725
Return o	n Rate Base				6.56%

## MISSOURI PUBLIC SERVICE 12 Months Ended 9/30/07 Per Books (IN THOUSANDS OF DOLLARS) FINANCIAL SURVEILLANCE MONITORING REPORT CAPITAL STRUCTURE AND RATE OF RETURN

## **Overall Cost of Capital**

					Weighted
		Amount	Percent	Cost	Cost
Long-Term Debt	\$	492,512,083	51.64%	6.51%	3.36%
Short-Term Debt		-	0.00%		0.00%
Preferred Stock		-	0.00%		0.00%
Other		-	0.00%		0.00%
Common Equity	<u></u>	461,149,621	48.36%	10.25%	4.96%
Total Overall Cost of Capital Based on Rate Case Rate of Return on Equity	\$	953,661,704	100.00%		8.32%

# Actual Earned Return on Equity

	Amount	Percent	Cost	Weighted Cost
Long-Term Debt	\$ 492,512,083	51.64%	6.51%	3.36%
Short-Term Debt	-	0.00%		0.00%
Preferred Stock	-	0.00%		0.00%
Other	-	0.00%		0.00%
Common Equity	 461,149,621	48.36%	6.62%	3.20%
Total Overall Cost of Capital Actual Rate of Return on Equity	\$ 953,661,704	100.00%		6.56%

#### Missouri Public Service Quarter Ended and 12 Months Ended Per Books (IN THOUSANDS OF DOLLARS) FINANCIAL SURVEILLANCE MONITORING REPORT OPERATING INCOME STATEMENT

	Quarter Ended				12 Months Ended				
		As of	f Qtr3			As of Septe	ember	2007	
Operating Revenues:	· · · · ·								
Sales to Residential, Commercial, & Industrial									
Customers									
Residential	\$	99,074			\$	246,002			
Commercial		48,083				132,747			
Industrial		13,163				38,322			
Total of Sales to Residential, Commercial, &									
Industrial Customers			\$	160,320			\$	417,072	
Other Sales to Ultimate Customers				10,366	*			29,516	
Sales for Resale									
Off-System Sales				17,536				63,285	
Other Sales for Resale				473				1,514	
Provision for Refunds				-				-	
Other Operating Revenues				2,612				9,066	
Total Operating Revenues			\$	191,308			\$	520,453	
Operating & Maintenance Expenses:									
Production Expenses									
Fuel Expense									
Native Load		35,571				108,406			
Off-System Sales		877				3,142			
Other Production-Operations		3,237				12,850			
Other Production-Maintenance		4,616			<b>.</b>	17,607			
Purchased Power-Energy		.1				.,,			
Native Load		27,079				76,553			
Off-System Sales		14,881				51,894			
Purchased Power-Capacity		5,488				10,785			
Total Production Expenses			-	91,749				281,237	
Transmission Expenses				6,634				24,228	
Distribution Expenses				5,632				20,841	
Customer Accounts Expense				2,807				11,079	
Customer Service & Informational Expenses				53				272	
Sales Expenses				100				419	
Adminstrative & General Expenses				13,041				48,955	
Total Operating & Maintenance Expenses			\$	120,015			\$		
			Φ	120,015			φ	387,032	
Depreciation & Amortization Expense:		44.071							
Depreciation Expense		11,851				47,740			
Amortization Expense		82				834			
Decommissioning Expense		-				-			
Other	. <u> </u>	-	-			·			
Total Depreciation & Amortization Expense				11,933				48,575	
Taxes Other than Income Taxes				3,182				12,914	
Operating Income Before Income Tax				56,178				71,934	
Income Taxes				18,833				13,208	
			•	07.045					
Net Operating Income			\$	37,345			\$	58,725	
Actual Cooling Degree Days				1,175				1,657	
Normal Cooling Degree Days				936				1,325	
Actual Heating Degree Days				28				4,694	
· · · · · · · · · · · · · · · · · · ·									
Normal Heating Degree Days				65				5,249	

## MISSOURI PUBLIC SERVICE 12 Months Ended 9/30/07 Per Books (IN THOUSANDS OF DOLLARS) FINANCIAL SURVEILLANCE MONITORING REPORT Missouri Jurisdictional Allocation Factors

Descriptio		Allocation Factor
Plant in Se		00 4000/
	Intangible	99.433%
	Production - Steam	99.463%
	Production - Other	99.463%
	Transmission	99.463%
	Distribution	99.433%
	General	99.448%
	Total Plant in Service	99.449%
Reserve for	or Depreciation	
	Intangible	99.433%
	Production - Steam	99.463%
	Production - Other	99.463%
	Transmission	99.463%
	Distribution	99.433%
	General	99.448%
	Total Reserve for Depreciation	99.450%
Net Plant		
Materials & Cash	& Supplies	99.453%
Fuel Inven	itory	99.485%
Prepayme	nts	99.448%
	ulatory Assets	99.385%
Customer		100.000%
Customer		100.000%
	ted Deferred Income Taxes	99.448%
	ulatory Liabilities	99.454%
	is from Prior Rate Case	n/a
		n/d
Operating	Revenues	100.000%
	any Revenues	100.000%
	n Expenses	
1.0000000	Fuel Expense	
	Native Load	99.485%
	Off System Sales	99.463%
	Other Production Operations	99.484%
	Other Production Maintenance	99.463%
	Purchased Power-Energy	99.485%
	Native Load	99.485%
	Off System Sales	99.485%
	Purchased Power-Capacity	99.463%
Total Drad		
	luction Expenses	99.482%
	sion Expenses	99.463%
	n Expenses	99.433%
	Accounts Expense	100.000%
	Serv & Info Expense	100.000%
Sales Exp		100.000%
	ative & General Expense	99.467%
Depreciati	on Expense	
	Depreciation Expense	99.448%
	Amortization Expense	99.448%
Taxes Oth	er than Income Taxes	99.449%
Income Ta	axes	100.000%
Other Iten	าร	99.448%

MISSOURI PUBLIC SERVICE Quarter Ended and 12 Months Ended 9/30/07 Per Books FINANCIAL SURVEILLANCE MONITORING REPORT

NOTES TO FINANCIAL SURVEILLANCE REPORT

## ST. JOSEPH LIGHT & POWER 12 Months Ended 9/30/07 Per Books \$(000) (IN THOUSANDS OF DOLLARS) FINANCIAL SURVEILLANCE MONITORING REPORT RATE BASE AND RATE OF RETURN

Total Company Rate Base	Measurement Basis			onths Ended /30/2007
Plant in Service			_	
Intangible	End of Period	75		
Production - Steam	End of Period	155,008		
Production - Other	End of Period	17,282		
Transmission	End of Period	31,905		
Distribution	End of Period	170,479		
General	End of Period	41,932		
Total Plant in Service			\$	416,680
Reserve for Depreciation				
Intangible	End of Period	-		
Production - Steam	End of Period	96,195		
Production - Other	End of Period	16,740		
Transmission	End of Period	19,275		
Distribution	End of Period	74,488		
General	End of Period	15,095		
Total Reserve for Depreciation				221,793
Net Plant				194,887
Add				
Materials & Supplies	13 Mo Avg			7,453
Cash	From prior rate case including offsets			(8,102)
Fuel Inventory	13 Mo Avg			9,352
Prepayments	13 Mo Avg			1,235
Other Regulatory Assets	End of Period			20,317
Less				
Customer Deposits	13 Mo Avg			(951)
Customer Advances	13 Mo Avg			(126)
Accumulated Deferred Income Taxe	End of Period			(14,088)
Other Regulatory Liabilities	End of Period			-
Other Items from Prior Rate Case	Per Rate Case method			
Total Rate Base			<u>\$</u>	209,977
Net Operating Income				8,150
Return on Rate Base				3.88%

## ST. JOSEPH LIGHT & POWER 12 Months Ended 9/30/07 Per Books (IN THOUSANDS OF DOLLARS) FINANCIAL SURVEILLANCE MONITORING REPORT CAPITAL STRUCTURE AND RATE OF RETURN

## **Overall Cost of Capital**

				Weighted
	Amount	Percent	Cost	Cost
Long-Term Debt	\$ 162,511,000	52.89%	7.75%	4.10%
Short-Term Debt	-	0.00%	0.00%	0.00%
Preferred Stock	-	0.00%	0.00%	0.00%
Other	-	0.00%	0.00%	0.00%
Common Equity	 144,772,941	47.11%	10.25%	4.83%
Total Overall Cost of Capital	\$ 307,283,941	100.00%		8.93%
Based on Rate Case Rate of Return on Equity				

# Actual Earned Return on Equity

	Amount	Percent	Cost	Weighted Cost
Long-Term Debt	\$ 162,511,000	52.89%	7.75%	4.10%
Short-Term Debt		0.00%	0.00%	0.00%
Preferred Stock	-		0.00%	0.00%
Other	-		0.00%	0.00%
Common Equity	 144,772,941	47.11%	-0.46%	-0.21%
Total Overall Cost of Capital Actual Rate of Return on Equity	\$ 307,283,941	100.00%		3.88%

#### St. Joseph Light Power Quarter Ended and 12 Months Ended Per Books (IN THOUSANDS OF DOLLARS) FINANCIAL SURVEILLANCE MONITORING REPORT OPERATING INCOME STATEMENT

	Quarte	r Ended			12 Monti	ns End	bet
	Aso	f Qtr3			As of Septe	ember	2007
Operating Revenues:							
Sales to Residential, Commercial, & Industrial							
Customers	• • • • • • • •			_	co c70		
Residential	\$ 20,147			\$	53,578		
Commercial	13,762				39,819		
Industrial	8,284				25,004		
Total of Sales to Residential, Commercial, &		•	10.100			•	440.404
Industrial Customers		\$	42,192			\$	118,401
Other Sales to Ultimate Customers			361				1,416
Sales for Resale							
Off-System Sales			1,916				6,224
Other Sales for Resale			-				-
Provision for Refunds			-				-
Other Operating Revenues			5,048				19,897
Total Operating Revenues		\$	49,517			\$	145,939
Operating & Maintenance Expenses:							
Production Expenses							
Fuel Expense							
Native Load	8,399				30,675		
Off-System Sales	544				1,725		
Other Production-Operations	2,318				8,664		
Other Production-Maintenance	1,651				7,717		
Purchased Power-Energy	•						
Native Load	7,996				35,129		
Off-System Sales	823				2,317		
Purchased Power-Capacity	2,403	-			7,159	-	
Total Production Expenses			24,134				93,386
Transmission Expenses			1,693				6,374
Distribution Expenses			1,523				5,564
Customer Accounts Expense			667				2,733
Customer Service & Informational Expenses			31				148
Sales Expenses			20				93
Adminstrative & General Expenses			4,356				17,410
		\$	32,423			\$	125,708
Total Operating & Maintenance Expenses		φ	52,425			÷	123,100
Depreciation & Amortization Expense:							
Depreciation Expense	2,913				11,889		
Amortization Expense	14				46		
Decommissioning Expense	-				-		
Other		-			-		
Total Depreciation & Amortization Expense			2,927				11,935
Taxes Other than income Taxes			958			<u> </u>	3,937
Operating Income Before Income Tax			13,209				4,359
Income Taxes			5,123				(3,791)
Net Operating Income		\$	8,086			\$	8,150
Actual Cooling Degree Days			1,175				1,657
Normal Cooling Degree Days			936				1,325
Actual Heating Degree Days			28				4,694

#### ST. JOSEPH LIGHT & POWER 12 Months Ended 9/30/07 FINANCIAL SURVEILLANCE MONITORING REPORT Missouri Jurisdictional Allocation Factors

Description Allocation Factor Plant in Service Intangible 100.000% Production - Steam 100.000% 100.000% Production - Other Transmission 100.000% Distribution 100.000% 100.000% General Total Plant in Service 100.000% Reserve for Depreciation 100.000% Intangible 100.000% Production - Steam 100.000% 100.000% **Production - Other** 100.000% Transmission 100.000% Distribution 100.000% General Total Reserve for Depreciation 100.000% Net Plant 100.000% Materials & Supplies 100.000% Cash 100.000% 100.000% Fuel Inventory Prepayments 100.000% Other Regulatory Assets 100.000% Customer Deposits 100.000% **Customer Advances** 100.000% Accumulated Deferred Income Taxes 100.000% Other Regulatory Liabilities 100.000% Other Items from Prior Rate Case 100.000% **Operating Revenues** 100.000% 100.000% Intercompany Revenues Production Expenses 100.000% Fuel Expense 100.000% 100.000% Native Load 100.000% Off System Sales 100.000% Other Production Operations Other Production Maintenance 100.000% Purchased Power-Energy 100.000% 100.000% Native Load Off System Sales 100.000% Purchased Power-Capacity 100.000% **Total Production Expenses** 100.000% 100.000% **Transmission Expenses Distribution Expenses** 100.000% Customer Accounts Expense 100.000% Customer Serv & Info Expense 100.000% Sales Expense 100.000% Administrative & General Expense 100.000% Depreciation Expense **Depreciation Expense** 100.000% Amortization Expense 100.000% 100.000% Taxes Other than Income Taxes Income Taxes 100.000% 100.000% Other Items

ST. JOSEPH LIGHT & POWER Quarter Ended and 12 Months Ended 9/30/07 Per Books FINANCIAL SURVEILLANCE MONITORING REPORT

## NOTES TO FINANCIAL SURVEILLANCE REPORT

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

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In the Matter of Aquila, Inc., d/b/a Aquila Networks – MPS and Aquila Networks – L&P for Authority to Implement Rate Adjustments Required by 4 CSR 240-20.090(4) and the Company's Approved Fuel and Purchased Power Cost Recovery Mechanism

Case No. \_\_\_\_\_

## **MOTION FOR WAIVER**

Aquila, Inc., d/b/a Aquila Networks – MPS and Aquila Networks – L&P ("Aquila" or "Company"), by and through its undersigned counsel, and pursuant to and in accordance with 4 CSR 240-2.015, hereby moves the Missouri Public Service Commission ("Commission") for an order granting the Company a waiver of certain of the requirements of 4 CSR 240-3.161(5). In support of its motion, Aquila states as follows:

1. Contemporaneously with this motion, Aquila has filed rate schedules that, if approved by the Commission, will allow the Company to implement rate adjustments that are required by 4 CSR 240-20.090(4) as well as by the terms of the Company's own fuel adjustment clause ("FAC"), which was approved by the Commission in Case No. ER-2007-0004.

2. The Commission's rules governing the administration of approved FACs require Aquila to periodically submit certain information specified in those rules. The provisions of 4 CSR 240-3.161(6) require that the Company submit Surveillance Monitoring Reports quarterly, and the report for the quarter ending September 2007 accompanies the rate schedules that Aquila is filing in this case. In addition, 4 CSR 240-

3.161(5) requires the Company to submit monthly reports that include a range of financial information specified in that rule. Those reports are to be submitted no later than sixty days after the end of the month being reported; however, because 4 CSR 240-3.161(5)(A) calls for information regarding "revenues billed pursuant to the RAM by rate class and voltage level," Aquila believed that its first monthly report did not have to be submitted until after the Company's initial, FAC-related rate adjustment had occurred.

3. As it prepared to file the rate schedules required to adjust its FAC-related rates, the Company became concerned that its interpretation of 4 CSR 240-3.161(5)(A) was incorrect. Therefore, in an abundance of caution, on December 10, 2007, Aquila submitted financial reports for the months of June, July, August, and September 2007 as well as a report for October 2007, the latest month for which the required financial data are available. In accordance with the Commission's rules, the Company submitted copies of these reports to the Commission Staff, the Office of the Public Counsel, as well as to each party to Aquila's last general rate case, Case No. ER-2007-0004.

4. Because 4 CSR 240-090(4) requires, *inter alia*, that a company seeking to adjust rates in accordance with its approved FAC be current on the submission of both its quarterly Surveillance Monitoring Reports as well as all monthly reports required by 4 CSR 240-3.161(5), Aquila believes a waiver of the Commission's rules may be required to remedy the Company's confusion about when submission of the monthly reports was to commence, which delayed the filing of the reports for June through September 2007 beyond the sixty days specified in the rule. If a waiver is required, good cause exists for that waiver because ambiguity in the Commission's rule caused Aquila reasonably to conclude that its obligation to submit monthly reports did not commence until after its

initial, FAC-related rate adjustment. Moreover, delaying the filing of the monthly financial reports for June through September 2007 until December 10<sup>th</sup> did not significantly disadvantage or create hardship for the Commission Staff, the Office of the Public Counsel, or any of the other parties that received copies of those reports. Even with the delayed filings, each of these parties will have ample time to review the reports in conjunction with the rate schedules and supporting data that are being filed concurrently with this motion and to then make their views known to the Commission on the rate adjustment that Aquila is requesting.

WHEREFORE, for the reasons stated above, if the Commission determines that 4 CSR 240-3.161(5) requires that monthly financial reports be submitted commencing with the first month following the approval of the Company's FAC, then Aquila requests the Commission grant the Company's request for a waiver of the requirement that the monthly financial reports for the months of June, July, August, and September 2007 be submitted within sixty days of the end of the month being reported.

Respectfully submitted,

James C. Swearengen MBN 21510 *L*. Russell Mitten MBN 27881 BRYDON, SWEARENGEN & ENGLAND P.C. 312 E. Capitol Avenue P. O. Box 456 Jefferson City, MO 65102 (573) 635-7166 voice (573) 635-3847 facsimile Email: rmitten@brydonlaw.com

## ATTORNEYS FOR AQUILA, INC.

## **CERTIFICATE OF SERVICE**

I hereby certify that the undersigned has caused a complete copy of the attached document to be electronically filed and served on the Commission's Office of General Counsel (at <u>gencounsel@psc.mo.gov</u>) and on the Office of Public Counsel (at <u>opcservice@ded.mo.gov</u>) and also to be served electronically or by U.S. Mail on the following counsel of record on this 28<sup>th</sup> day of December, 2007.

Mary Ann Young William D. Steinmeier P.O. Box 104595 2031 Tower Drive Jefferson City, MO 65102 myoung0654@aol.com wds@wdspc.com For the City of St. Joseph, MO

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Mark W. Comley 601 Monroe Street, Suite 301 P.O. Box 537 Jefferson City, MO 65102-0537 <u>comleym@ncrpc.com</u> For the City of Kansas City, MO

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Major Sloan M. P. Pye 101 West Market, Suite 301 Warrensburg, MO 64093 For Federal Executive Agencies

Shelley Woods Missouri Department of Natural Resources P.O. Box 899 Jefferson City, MO 65102-0899 <u>Shelley.woods@ago.mo.gov</u> For Missouri Department of Natural Resources

L. Russell Mitten

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

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In the Matter of Aquila, Inc., d/b/a Aquila Networks – MPS and Aquila Networks – L&P for Authority to Implement Rate Adjustments Required by 4 CSR 240-20.090(4) and the Company's Approved Fuel and Purchased Power Cost Recovery Mechanism

Case No. \_\_\_\_\_

## MOTION FOR PROTECTIVE ORDER

Aquila, Inc., d/b/a Aquila Networks – MPS and Aquila Networks – L&P ("Aquila" or "Company"), by and through its undersigned counsel, hereby moves the Missouri Public Service Commission ("Commission") for protective order pursuant to 4 CSR 240-2.085. In support of its motion, Aquila states as follows:

1. Contemporaneously with this motion, Aquila has filed rate schedules that, if approved by the Commission, will allow the Company to implement rate adjustments that are required by 4 CSR 240-20.090(4) as well as by the terms of the Company's own fuel adjustment clause ("FAC"), which was approved by the Commission in Case No. ER-2007-0004. In support of these rate schedules, the Company is required to file information specified in 4 CSR 240-3.161(7), which includes some information that is highly confidential and/or proprietary.

2. In addition, Aquila anticipates that during the course of the Commission's consideration of these FAC-related rate schedules other parties likely will undertake discovery that require the Company to disclose information that is highly confidential, proprietary, or both.

3. In view of the foregoing, Aquila desires that the Commission issue a protective order in this case that will cover all information that is designated either "Highly Confidential" or "Proprietary." When that occurs, the Company will file the information required by 4 CSR 240-3.161(7) that has been designated "Highly Confidential" or "Proprietary" and will provide copies of that information to the Commission's General Counsel, the Office of the Public Counsel, and all other parties to Aquila's most recent general rate case, Case No. ER-2007-0004.

WHEREFORE, Aquila moves the Commission to issue the protective order requested in this motion.

Respectfully submitted,

James C. SwearengenMBN 21510L. Russell MittenMBN 27881BRYDON, SWEARENGEN & ENGLAND P.C.312 E. Capitol AvenueP. O. Box 456Jefferson City, MO 65102(573) 635-7166 voice(573) 635-3847 facsimileEmail: rmitten@brydonlaw.com

ATTORNEYS FOR AQUILA, INC.

## **CERTIFICATE OF SERVICE**

I hereby certify that the undersigned has caused a complete copy of the attached document to be electronically filed and served on the Commission's Office of General Counsel (at <u>gencounsel@psc.mo.gov</u>) and on the Office of Public Counsel (at <u>opcservice@ded.mo.gov</u>) and also to be served electronically or by U.S. Mail on the following counsel of record on this 28<sup>th</sup> day of December, 2007.

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