

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

In the Matter of Aquila, Inc. d/b/a)	
Aquila Networks - L&P and Aquila)	Case No. ER-2004-0034
Networks - MPS to Implement a)	
General Rate Increase in Electricity)	

In the Matter of the Request of)	
Aquila, Inc. d/b/a Aquila Networks-)	Case No. HR-2004-0024
L&P to Implement a General)	(Consolidated)
Rate Increase in Steam Rates.)	

AQUILA, INC.'S REQUEST FOR ADDITIONAL TIME TO RESPOND
TO AG PROCESSING INC'S MOTION TO DISMISS AND REJECT AQUILA
NETWORKS' UNAUTHORIZED FILING OF PROPOSED STEAM AND ELECTRIC
TARIFFS AND FOR THE APPOINTMENT OF A CONSERVATOR FOR THE
BENEFIT OF THE SHAREHOLDERS OF ST. JOSEPH LIGHT & POWER CO.

Comes now Aquila, Inc. ("Aquila"), by counsel, and, pursuant to 4 CSR 240-2.080(15), for its Request for Additional Time to Respond to AG Processing Inc.'s Motion to Dismiss and Reject Aquila Networks' Unauthorized Filing of Proposed Steam and Electric Tariffs and for the Appointment of a Conservator for the Benefit of the Shareholders of St. Joseph Light & Power Co. ("Motion to Dismiss") states to the Missouri Public Service Commission ("Commission") as follows:

1. On January 12, 2004, AG Processing Inc. ("AGP") filed its Motion to Dismiss in this proceeding asking that the Commission dismiss and reject Aquila's filing to change electric rates for the St. Joseph Light & Power Co. service area as an unauthorized filing, dismiss Aquila's filing to change the steam service rates for the St. Joseph Power & Light Co. service area as an unauthorized filing, and that the Commission's General Counsel be directed to join with AGP to petition the Circuit Court of Cole County for the appointment of a conservator for the benefit and

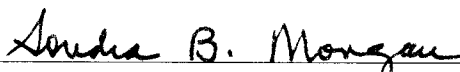
interest of the shareholders of St. Joseph Light & Power Co.

2. Commission rule 4 CSR 240-2.080(15) states that "[p]arties shall be allowed not more than ten (10) days from the date of the filing in which to respond to any pleading *unless otherwise ordered by the commission.*" (Emphasis added.) Thus pursuant to this rule, the response of Aquila and other parties to this proceeding would be due no later than January 22, 2004.

3. The Motion to Dismiss raises important and novel issues with ramifications that extend beyond the instant proceeding. Consequently, Aquila requires additional time to prepare its response. Thus, Aquila requests that the Commission grant an additional twenty (20) days up to and including February 11, 2004, to file its response to the Motion to Dismiss.

Wherefore Aquila respectfully requests that the Commission grant it additional time up to and including February 11, 2004, to respond to AGP's Motion to Dismiss and for any other relief appropriate in the circumstances.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered or mailed by U.S. mail on this 20th day of January, 2004, to the following:

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