

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

In the Matter of Aquila, Inc., d/b/a Aquila)	
Networks – MPS’s Purchased Gas Adjustment n)	Case No. GR-2004-0539,
Factors to be Reviewed in its 2003-2004 Actual)	as consolidated
Cost Adjustment.)	

FIRST AMENDED RESPONSE TO STAFF RECOMMENDATION

Comes now Aquila, Inc., and, in accordance with Missouri Public Service Commission (“Commission”) Rule 4 CSR 240-2.080(20), states the following as its First Amended Response to Staff Recommendation:

1. On December 22, 2005, Aquila filed its Response to Staff Recommendation (Response) in this case. Aquila hereby incorporates by reference the matters described in its Response.

2. Rule 4 CSR 240-2.080(20) provides that “any pleading may be amended within ten (10) days of filing, unless a responsive pleading has already been filed.” This filing is being made within ten days of the filing of the original response and no responsive pleading has been filed.

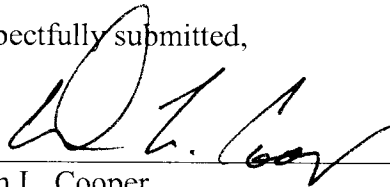
3. In regard to storage issues related to Aquila’s L&P system, Aquila identified several matters of disagreement/suggested corrections in paragraphs 6-13 of the Response to Staff Recommendation. Aquila then stated in paragraph 14 that “after these corrections are made to Staff’s storage calculation that no further adjustments are necessary”

4. After further review of the L&P Storage calculations, Aquila must amend its response. Aquila does not agree with Staff’s recommendation to reduce gas cost by \$23,839. Aquila believes that the gas cost should be reduced by \$32,602. After the settlement of Case GR-2003-0369, Aquila took the ending balance from August 2003 and recalculated the L&P

storage for the 2003/2004 ACA year and made all the necessary adjustments using the agreed upon methodology. Aquila also at this time included all storage injection costs, which are included on the ANR pipeline statements. This includes not only the months of September 2003 and October 2003, as indicated in Aquila's original response, but also includes the months of March 2004 through August 2004. This adjustment was made in the May 2005 tracker and provides an additional area of disagreement with the Staff Recommendation.

WHEREFORE, Aquila respectfully requests that the Commission consider this First Amended Response to Staff Recommendation and Aquila's Response to Staff Recommendation and, thereafter, issue such orders as it believes to be reasonable and just.

Respectfully submitted,



Dean L. Cooper MBE#36592
BRYDON, SWEARENGEN & ENGLAND P.C.
312 E. Capitol Avenue
P. O. Box 456
Jefferson City, MO 65102
(573) 635-7166
(573) 635-3847 facsimile
dcooper@brydonlaw.com

ATTORNEYS FOR AQUILA, INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail on December 28, 2005, to the following:

Robert V. Franson
Office of the General Counsel
robert.franson@psc.mo.gov

Eric Martin
Office of the Public Counsel
eric.martin@ded.mo.gov

