

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

In the Matter of Union Electric Company)	
d/b/a AmerenUE for Authority to File)	
Tariffs Increasing Rates for Electric)	Case No. ER-2007-0002
Service Provided to Customers in the)	
Company's Missouri Service Area.)	

**APPLICATION TO INTERVENE OF
AQUILA, INC.**

Aquila, Inc. (Aquila), pursuant to Missouri Public Service Commission (Commission) Rule 4 CSR 240-2.075, requests that it be allowed to intervene in the above-entitled matter. In support of its application, Aquila states as follows:

1. Aquila is a Delaware corporation with its principal office and place of business at 20 West Ninth Street, Kansas City, Missouri 64105-1711. The company is authorized to conduct business in Missouri through its Aquila Networks-MPS and Aquila Networks-L&P operating divisions. Aquila is engaged in the business of providing electric and industrial steam utility services to customers in its service areas in Missouri.

2. Aquila is an "electrical corporation," a "heating company," and a "public utility" as those terms are defined in Section 386.020 RSMo 2000, and is subject to the jurisdiction and supervision of the Commission, as provided by law.

3. Aquila has no final, unsatisfied judgments or decisions against it from state or federal regulatory agencies or courts that involve customer service and that have occurred within the three (3) years immediately preceding the filing of this application, and has no overdue Commission annual reports or assessment fees.

Aquila has a general rate case pending before the Commission, Case No. ER-2007-0004.

4. Aquila filed copies of the registrations of the fictitious names of Aquila Networks-MPS and Aquila Networks-L&P with the Commission in Case No. EU-2002-1053. These documents are incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G). A Certificate of Authority from the Missouri Secretary of State to the effect that Aquila, a foreign corporation, is authorized to do business in the State of Missouri, was filed with the Commission in Case No. EU-2002-1053. That document is also incorporated herein by reference.

5. Pleadings, notices, orders, and other correspondence and communications concerning this application should be addressed to:

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6. As an electric utility, Aquila's interests differ from those of the general public. Aquila's interests in this case will focus on AmerenUE's proposal to establish a fuel adjustment clause (FAC) and an environmental cost recovery rider (ECR), pursuant to Section 386.266, RSMo. As the Commission is aware, Aquila is requesting an FAC in its pending general rate case, Case No. ER-2007-0004. The evidence related to

AmerenUE's proposed FAC and ECR and the Commission's deliberations regarding that evidence could affect the outcome of the FAC that Aquila has requested in its pending case. Accordingly, Aquila's participation as an intervenor is necessary to assure that the interests of the company, its shareholders, and its customers regarding its proposed FAC are fully protected. Moreover, allowing Aquila to participate as an intervenor would serve the public interest because it will afford the company an opportunity to provide useful and relevant information that may aid the Commission in its deliberations regarding AmerenUE's proposed FAC and ECR.

WHEREFORE, Aquila prays that the Commission issue its order granting the company permission to intervene in the above-entitled matter.

Respectfully submitted,

/s/ L. Russell Mitten
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ATTORNEYS FOR THE AQUILA, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, electronic mail or hand delivery, on the 26th day of July, 2006, to the following:

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