

Exhibit No.:

Issues: Missouri Operations

Witness: Ivan Vancas

Sponsoring Party: Aquila Networks-MPS  
& L&P

Case No.: ER-

Before the Public Service Commission  
of the State of Missouri

Direct Testimony

of

Ivan Vancas

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**ON BEHALF OF AQUILA, INC.**  
**D/B/A AQUILA NETWORKS-MPS AND AQUILA NETWORKS-L&P**  
**CASE NO. ER-\_\_\_\_\_**

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**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI  
DIRECT TESTIMONY OF IVAN VANCAS  
ON BEHALF OF AQUILA, INC.  
D/B/A AQUILA NETWORKS-MPS AND AQUILA NETWORKS-L&P  
CASE NO. ER-\_\_\_\_\_**

1 Q. Please state your name and business address.

2 A. My name is Ivan Vancas. My business address is 10700 East 350 Highway, Kansas City,  
3 Missouri 64138.

4 Q. By whom are you employed and in what capacity?

5 A. I am employed by Aquila, Inc. (“Aquila” or “Company”) as Operating Vice President –  
6 Missouri Electric. I have responsibilities for the operation of Aquila’s electric  
7 transmission and distribution business through its Aquila Networks-MPS (“MPS”) and  
8 Aquila Networks-L&P (“L&P”) operating divisions.

9 Q. Briefly describe your education and work experience.

10 A. I graduated from Kansas State University in Manhattan, Kansas with a Bachelor of  
11 Science Degree in Electrical Engineering in 1989. I have worked for Aquila and its  
12 predecessor companies since 1989 and have held various positions in field operations,  
13 engineering and management.

14 Q. Have you testified previously in any jurisdiction?

15 A. Yes. I have previously provided testimony to the Missouri Public Service Commission  
16 (“Commission”), as well as the Iowa Utilities Board.

17 **EXECUTIVE SUMMARY**

18 Q. What is the purpose of the direct testimony you are now submitting?

1 A. In general, I will be addressing Aquila's commitment to meeting or exceeding our  
2 customers' expectations in regards to electric service. Despite the financial challenges  
3 that Aquila has had in recent years, that commitment has never changed. In support of  
4 this fact, I will specifically address the following four areas:

- 5 1. The Commission Review of Customer Service Processes and Operations;
- 6 2. Electric service reliability and key performance metrics;
- 7 3. Aging workforce issues; and
- 8 4. Aquila's Affordability Initiatives.

9 **CUSTOMER SERVICE AUDIT/REVIEW**

10 Q. Throughout the course of 2005, and culminating with a report issued October 2005, the  
11 Commission's Engineering and Management Services Department ("EMSD") spent  
12 considerable time and effort analyzing many facets of Aquila's customer service  
13 operations. Did you participate in that review?

14 A. I did at a high level. At the time of the review, I held the position of Operating Vice  
15 President – Iowa and Missouri Gas Operations. In that role I had some involvement with  
16 the natural gas operations portion of the process. However, much of the review focused  
17 on functions performed by our central services group such as call center and billing  
18 activities.

19 Q. Did Aquila find the feedback and recommendations provided by EMSD beneficial?

20 A. Absolutely. Familiarity with the best practices of other utilities across the state, and the  
21 cooperative manner in which EMSD performed their review and conveyed their results  
22 and recommendations, was very beneficial.

23 Q. What were some of the recommendations that came out of the study?

1 A. There were 52 recommendations in seven categories, including call center operations,  
2 credit and collections, work orders, meter reading, customer billing and payment, and  
3 disconnection/reconnection processes. These recommendations included such things as  
4 continuing to focus on reduction of call center employee turnover and development of  
5 customer payment remittance reports. Many of these recommendations were already  
6 being addressed as the report was being prepared.

7 Q. What progress has been made by Aquila in response to the study recommendations?

8 A. Aquila developed a detailed implementation plan in December 2005 to address the  
9 recommendations made by the EMSD. This implementation plan identifies the Aquila  
10 manager responsible for each of the recommendations in the report. An overall work  
11 plan is in place to act upon those recommendations over the next 2-3 years. Our first bi-  
12 annual status report is due to the EMSD June 30, 2006, and Aquila's staff has been  
13 working diligently during the first half of this year in order to keep their work plans on  
14 schedule and to provide the June 2006 update as required. Aquila is committed to acting  
15 upon these recommendations for the benefit of our customers.

16 **ELECTRIC SERVICE RELIABILITY AND KEY PERFORMANCE METRICS**

17 Q. Please describe Aquila's approach to electric service reliability.

18 A. First and foremost, Aquila is committed to providing safe, reliable and quality electric  
19 service to our customers. The two most important requirements to accomplishing this  
20 goal are to keep the lights on and to provide timely and accurate bills. Therefore, these  
21 are two of the areas in which Aquila puts the most focus.

22 Q. What key performance measures does Aquila utilize in order to measure electric  
23 customer service reliability?

1 A. Aquila utilizes industry-standard performance measures, specifically:

2 SAIDI – System Average Interruption Duration Index (defined as the amount of minutes  
3 the average customer is out of service per period or total customer interruption durations  
4 divided by total customers)

5 SAIFI – System Average Interruption Frequency Index (defined as the average number  
6 of interruptions experienced by a customer or customers interrupted / total customers)

7 CAIDI – Customer Average Interruption Duration Index (defined as the number of  
8 minutes to restore service when a customer has an outage defined as customer  
9 interruption durations divided by customers interrupted)

10 Q. What are some of the major factors that affect these reliability indicators?

11 A. Weather is the most significant contributor. Utility companies normalize to some extent  
12 extreme conditions from year to year by using a normalization function. This feature is  
13 utilized only during major outages such as ice storms, hurricanes or tornado/wind events  
14 where a defined number of customers experience outages for a specific period of time.  
15 The normalization does not remove all weather related outages, but does extract the  
16 significant or extreme events.

17 Q. What criteria does Aquila use to normalize extreme conditions?

18 A. Aquila's definition for normalization is any single event that causes 10% or more of our  
19 total customers to be without service for more than 12 hours.

20 Q. How frequently has Aquila used this criterion to normalize outage statistics? In other  
21 words, how frequently does an event significant enough to justify normalization occur?

22 A. Based on the typical events experienced across Aquila's service area here in the Midwest,  
23 and the resulting system damage, there are typically two or fewer normalized events

1 annually. Using the latest three years (2003-2005) as an example, reliability metrics have  
2 been normalized a total of four times during the past three years (January 2005 ice storm,  
3 major thunderstorms in June and July 2004, and a tornado in May 2003).

4 Q. What are your normalized reliability indicators during the last three years, and how do  
5 these indicators compare to the Edison Electric Institute (“EEI”) national averages?

6 A. The most recent three year averages (2003-2005) for the combined MPS and L&P service  
7 areas, along with the most recently available EEI data<sup>1</sup>, are as follows:

	Aquila	EEI Averages	Better/(Worse)
SAIDI (minutes)	134.9	140.9	6.0
SAIFI	1.47	1.25	(0.22)
CAIDI (minutes)	90.1	107.9	17.8

8 These numbers indicate that Aquila is better than the national average in terms of SAIDI  
9 and CAIDI, while it is slightly below average in terms of SAIFI.

10 Q. How does a SAIDI measurement of 134.9 minutes relate to actual customer reliability?

11 A. This is the average number of minutes a customer is without electrical service during an  
12 entire calendar year. Some customers have more, some customers have less, and some  
13 customers have no service interruptions at all (customer interruption durations / total  
14 customers). This number represents an average yearly period over the last three years. A  
15 year consists of 525,600 minutes. If the average customer experiences yearly outages  
16 totaling 134.9 minutes, then the availability of electrical service is 99.97%. The EEI

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<sup>1</sup> The EEI data for 2005 is not yet available. In addition, beginning in 2004, EEI no longer calculates a “national average”. Instead, they publish a quartile matrix for individual utilities to see what quartile of the nation their metrics fall into. Therefore, the EEI data included in the table is for the period 2001 – 2003.

1 national average SAIDI is 140.9 minutes. Thus the 134.9 minutes experienced by our  
2 customers is 6.0 minutes better than the EEI national average.

3 Q. Is electric service reliability data for Aquila's Missouri operations made available to the  
4 Commission Staff ("Staff") on a regular basis?

5 A. Yes. Reliability metrics for SAIDI, SAIFI and CAIDI are provided to Staff on a monthly  
6 basis by Aquila.

7 Q. How does Aquila maintain this high level of reliability?

8 A. First, it starts with a dedicated and committed work force. Aquila employees take great  
9 pride in ensuring a reliable system. Like any system, Aquila's network requires constant  
10 maintenance to ensure its continued reliability. In addition, it takes a commitment to  
11 investing financially in the network system.

12 Q. Has Aquila made that financial commitment?

13 A. Definitely. While Aquila has had financial challenges over the last several years, it has  
14 never wavered from its commitment to maintain a good, reliable network. The reliability  
15 metrics I've discussed show the results of that commitment.

16 Q. How much capital has Aquila invested in its system in Missouri over the last several  
17 years?

18 A. Aquila has invested approximately \$545 million (including the turbines installed at South  
19 Harper) in its Missouri system from 2001 – 2005.

20 Q. How much additional capital is Aquila planning to invest in Missouri over the next  
21 several years?

22 A. Aquila is forecasting to spend an additional \$110 million in 2006. Approximately \$61  
23 million of this 2006 expenditure will be on the distribution and transmission systems



1 serving Missouri customers, while the remainder will be on generation assets serving  
2 Missouri customers. In addition, Aquila is forecasting to spend more than \$1 billion  
3 more from 2007 – 2011.

4 Q. What key indicators does Aquila utilize in order to measure meter reading performance?

5 A. The two key performance measures utilized by Aquila relative to meter reading are  
6 “Meters Read on Time” and “Meter Reading Accuracy”. In other words, does the  
7 Company read the customer’s meter when its supposed to, and when it reads the meter,  
8 does the Company read it accurately? Over the years customers have indicated that  
9 receiving a timely and accurate monthly billing is important to them, and accurately  
10 reading the meter, on time, is key to the success of the overall billing process.

11 Q. What exactly do these two metrics measure or reflect about the overall meter reading  
12 process?

13 A. “Meters Read on Time” measures the percentage of total meters across the service area  
14 that are read within a prescribed three-day billing window each billing cycle. “Meter  
15 Reading Accuracy” measures the percentage of customer accounts that require no billing  
16 adjustment specifically related to an incorrect or inaccurate meter reads.

17 Q. What are your meter reading indicators during the last three years?

18 A. The most recent three year averages (2003-2005) for the combined MPS and L&P service  
19 areas are as follows:

20 Meters Read on Time = 99.2%

21 Meter Reading Accuracy = 99.8%

22 Q. Do you believe this to be acceptable levels of service for these two measures?

1 A. Yes. Aquila has set its goals to read 98.0% of meters on time with 99.5% accuracy. We  
2 are exceeding both of these goals.

3 Q. What other information or key indicators does Aquila utilize in order to measure overall  
4 customer satisfaction?

5 A. For several years, Aquila has utilized the Gallup organization to survey customers  
6 regarding their satisfaction in the areas of service connection, payment arrangements,  
7 billing and image. Every month Gallup surveys customers that have recently interacted  
8 with Aquila in some fashion or through some request for a service (payment  
9 arrangement, a connect order, a billing inquiry, etc.). Customers are asked to provide a  
10 rating on a one (1) thru five (5) scale (five being the best) regarding their experience or  
11 interaction with Aquila. The rating that is returned to Aquila is a score that reflects the  
12 percentage of those surveyed that rated their contact with Aquila as a five (or highest)  
13 rating.

14 Q. Why does Aquila focus on scores that reflect the highest rating?

15 A. Gallup has indicated to us that this rating is the best predictor of performance from a  
16 customer's point of view, and is consistent with how other surveys are interpreted.

17 Q. What do your Gallup customer satisfaction survey results tell you about your Missouri  
18 customers' views of their interactions with Aquila in the areas measured?

19 A. The most recent three year averages (2003-2005) for the combined MPS and L&P service  
20 areas are as follows:

21 Connect = 66

22 Payment = 56

23 Billing = 49

1 Image = 45

2 Composite = 54

3 Q. How do you interpret these survey results?

4 A. They are positive. What these results tell us is that overall, over half of those Missouri  
5 customers surveyed feel that Aquila is meeting their needs at the highest level. The  
6 Gallup organization has indicated to us that a score of over 50 is very good. In general,  
7 any “top box” score (five on a scale of one to five) of over 40 is considered by Gallup to  
8 be a good result. In addition, we have experienced consistent improvement in these  
9 results. We feel particularly positive about these results, especially payment  
10 arrangements, which can be difficult for customers. Even so, we are continuing our  
11 efforts to improve results in each of these areas.

12 Q. Are there any other factors that you would like to discuss regarding Aquila’s commitment  
13 to customer satisfaction?

14 A. Yes, I would like to discuss safety.

15 Q. How exactly does safety affect customer satisfaction and operational effectiveness?

16 A. First of all, safety is key and critical to not only our employees, but to the general public  
17 and our customers as well, because it demonstrates our commitment to do things the right  
18 way- by investing in the necessary training and in the required tools and equipment. Due  
19 to the nature of our business, employee safety is one of the key metrics measured across  
20 the electric utility industry, and receives a great deal of attention from governing and  
21 industry bodies such as the Occupational Safety and Health Administration (“OSHA”)  
22 and the Department of Labor (“DOL”). Utility accidents can become highly publicized  
23 due to their potential for serious injury. It can be a natural extension for customers to

reflect poor safety and accident rates upon the utilities system and operational organization as a whole.

Q. What key indicators does Aquila utilize in order to measure safety performance?

A. The two key indicators that Aquila measures are “Chargeable Vehicle Accidents” and “Lost Time Personal Injuries”.

Q. How are these measures defined, and by whom?

A. Lost Time Personal Injuries are calculated as a rate and are defined by the DOL.

Chargeable Accidents are calculated as a rate as well, and are tracked through surveys of US utilities by industry groups such as EEI and the American Gas Association (“AGA”).

The Chargeable Vehicle Accident rate is calculated as:

$(\text{Number of Accidents}) \times (1,000,000 \text{ miles}) / (\text{Actual miles driven}).$

The Lost Time Personal Injury rate, as defined by DOL, is calculated as:

$(\text{Number of Accidents}) \times (200,000 \text{ hours}) / (\text{Actual hours worked}).$

Q. What are your Chargeable Vehicle Accident and Lost Time Personal Injury frequency rates during the last three years, and how do they compare to industry averages?

A. The most recent three-year averages (2003-2005) for the combined MPS and L&P service areas, along with the industry averages, are as follows:

	Aquila	Industry Average	Better/ (Worse)
Chargeable Vehicle Accident Frequency Rate	4.1	5.4	1.3
Lost Time Personal Injury Frequency Rate	2.4	2.5	0.1

These numbers indicate that Aquila is performing better than the national average in both of these areas.

### **AGING WORKFORCE**

1 Q. Please describe the issues surrounding the aging workforce at the Company, and what  
2 actions Aquila is taking to address this issue.

3 A. This issue is certainly affecting Aquila, but is having a dramatic affect on the electric  
4 utility industry as a whole. As employees born in the “baby boomer” era are now  
5 retiring, the industry has begun to suffer a lack of available replacement staff, particularly  
6 in the area of electric line workers. For the past several years, Aquila has been able to  
7 successfully supplement its company lineman workforce with contract employees.  
8 However, electric contractors are now beginning to experience the same employee  
9 shortages, coupled with a dramatic upswing in utility construction of generating facilities,  
10 substations, and transmission and distribution circuits – thus creating an even greater  
11 demand for qualified workers. In addition, fewer new workers are choosing to train for  
12 these positions.

13 Q. What is Aquila doing to address this shortage?

14 A. First of all, the Company’s compensation team is working to ensure that Aquila’s wages  
15 and benefits are competitive, particularly with other regional utilities, to ensure that the  
16 Company can attract available line workers. In addition, Aquila has several teams,  
17 utilizing the Six Sigma methodology, working to improve the productivity of its current  
18 company and union line personnel. Another Six Sigma team is analyzing the entire  
19 lineman recruitment and retention program, as well as searching for ways to more  
20 effectively “grow” the Company’s own lineman workforce through its apprentice training  
21 program. This team is reviewing all steps and aspects of the recruiting, retention and  
22 training process. We are going to great lengths to address this issue.

1 Q. Why can't Aquila simply hire and train as many apprentices as are needed to perform the  
2 required line work?

3 A. Industry and DOL standards dictate the training regimen and the time required to become  
4 a journeyman lineman. The time required to train a qualified journeyman lineman is 3-4  
5 years, depending on the knowledge and training the candidate brings to the program  
6 initially. In addition, collective bargaining agreements with Aquila's labor unions dictate  
7 apprentice-to-lineman working and training ratios. So in the end, the Company is  
8 training apprentices just as effectively and efficiently as it possibly can.

9 Q. Are there other key operational positions within Aquila that are becoming increasingly  
10 difficult to recruit and hire for?

11 A. Yes. The market for experienced and college graduate engineers has become very  
12 competitive. The global need to expand and improve all facets of utility and private  
13 infrastructure from electric and gas utilities, petroleum, communications, roads, sewers  
14 and the like has created a growing demand for engineers. Aquila's compensation group  
15 is currently gathering and reviewing market data to ensure that its pay rates and benefits  
16 will allow Aquila to attract and retain the required intellectual capital in this arena as  
17 well.

18 Q. Why is it important for Aquila to be addressing these issues now?

19 A. Hiring and retaining a qualified workforce is critical to the provision of electric service to  
20 our customers. In order to continue exceeding the industry-average metrics that I've  
21 previously discussed it is necessary that the Company address these impending issues  
22 now, before the problem becomes acute.

23 **AFFORDABILITY INITIATIVES**

1 Q. Please describe Aquila's efforts to help its customers control their energy costs.

2 A. Aquila recognizes that energy costs are a material expense for its customers, and an  
3 expense that is, unfortunately, increasing. Therefore, beyond Aquila's normal efforts to  
4 operate the business in an efficient and effective manner, coupled with its significant Six  
5 Sigma initiative, Aquila is also offering its customers a number of programs aimed at  
6 helping them manage their energy usage and expense. These programs can be divided  
7 into two categories. The first, which can be termed Energy Efficiency programs, are  
8 aimed at helping customers control their energy usage. Aquila witness Matt Daunis  
9 discusses the Company's Demand-Side Management programs.

10 Q. What is the second category?

11 A. The second category is what we call non-traditional assistance initiatives. These are  
12 programs or initiatives that are designed to lower or control the customer's energy  
13 payments by taking advantage of various programs that might be available and/or making  
14 new programs available.

15 Q. Please describe some of the programs to which you are referring.

16 A. There are several. I have included a listing of these programs, along with a short  
17 description of each, as Schedule IV-1 to this testimony. I will specifically describe two  
18 programs, Aquila Cares and the WeatherFriendly fixed bill programs.

19 Q. What is Aquila Cares?

20 A. Aquila Cares is a program instituted by Aquila across its multiple states to provide  
21 energy assistance funds to help those in need. Local agencies within each state  
22 administer the program and distribute contributions directly for local use in paying  
23 energy related expenses. Aquila matches both customer and employee contributions

1 dollar for dollar, up to \$375,000 in 2005. In addition, Aquila made a separate  
2 contribution to the program of \$250,000 in 2005. In Missouri, Aquila Cares donations  
3 totaled approximately \$110,000 in 2005, and are distributed by the United Way of  
4 Greater St. Joseph and the Mid America Assistance Coalition. In addition, Aquila and its  
5 employees donated an additional \$85,000 in St. Joseph to the United Way (these  
6 donations went to the general United Way fund and would have been allocated by the  
7 United Way according to its guidelines).

8 Q. Please describe the WeatherFriendly program.

9 A. The WeatherFriendly program is a fixed bill program. This two-year pilot program,  
10 approved by the Commission, is currently available to residential customers in St.  
11 Joseph. This program offers an option to those customers that value the stability of a  
12 fixed monthly bill with no adjustment during the year or true-up at the end of the year.  
13 Over 500 customers took advantage of this program in the first year of the pilot, and 94%  
14 of these customers renewed the second year. In addition, approximately 650 new  
15 customers accepted the fixed bill offer in the second year, so the total program  
16 participation has increased to over 1,100 customers. This program is currently being  
17 evaluated, and a decision regarding potentially making this program available to more  
18 Aquila customers will be made within the next year.

19 Q. Are any other Missouri companies offering such a program?

20 A. I am not aware of any other Missouri companies that currently offer a fixed bill program.

21 Q. Does Aquila intend to continue providing programs such as Aquila Cares and  
22 WeatherFriendly?



1 A. Yes. Aquila's Affordability Initiative is a major corporate focus. The Company has a  
2 team of 16 employees working on this initiative in order to identify, research, and  
3 implement new ideas within this area. In addition, there are many other employees  
4 contributing to the ongoing administration of these various programs. Aquila and its  
5 employees take their responsibilities to their customers very seriously.

6 **SUMMARY**

7 Q. Please summarize your testimony.

8 A. In this testimony I have described actions that Aquila has taken in response to the  
9 customer service audit performed by the Staff, the metrics that Aquila tracks and reports  
10 to ensure that we are providing reliable service and billing to our customers, the key issue  
11 of our aging workforce and the proactive steps that Aquila is taking to address this issue,  
12 and some of the programs that are part of Aquila's Affordability Initiative. The common  
13 theme of all of these points is Aquila's dedication to exceeding its customers'  
14 expectations in providing electric service.

15 Q. Does this conclude your direct testimony?

16 A. Yes, it does.

## **Aquila Affordability Initiatives**

### **Aquila Cares**

As a result of customer contributions and the Aquila dollar-for-dollar matching commitment, the company was able to make approximately \$110,000 available to assist customers in paying bills in Missouri. Aquila is currently looking at ways to increase the reach of this program in our service territory.

### **Earned Income Tax Credit (“EITC”)**

Three Aquila employees were certified for the Voluntary Income Tax Assistance (“VITA”) program sponsored by the IRS. Among other things, this program enables Aquila employees to assist customers, primarily those in need of help in paying utility bills, to file for and receive the tax benefits they are entitled to, such as the EITC. Although the initial effort was based in the Sedalia area, Aquila plans to expand the program next season by looking for additional VITA partners in our service territory. In addition, there has been an increase in the number of employees interested in becoming volunteers.

### **Energy Gift Certificate Program**

This program, which was initiated in April 2006, offers a way for an individual to help one of our customers with a payment on their bill. As designed, this program permits a gift giver to specify a dollar amount to be credited to the account of a customer. A customer is made aware of the gift through a bill message. Aquila is making Energy Gift Certificate forms available on its website or by mail or fax through the use of an Aquila 800 toll-free customer service line. Aquila will be actively marketing this program throughout its service territory.

### **On-line Assistance Site**

As a convenience to our customers, Aquila has recently redesigned its online customer service website. Third-party community action agencies now have on-line access to the information necessary to expedite the transfer of funds from the agencies to those customers in need of bill payment assistance.

### **Fixed Price Pilot Program**

Called WeatherFriendly, this program allows customers to pay the same amount for their electric service each month. Aquila has experienced a 94% renewal rate for this program in St. Joseph after the first year. In addition, participation has increased from approximately 500 customers to approximately 1,100 customers as we move into the second year of this two-year pilot program.

### Save Energy, Save Money Workshops

With support from the Heartland Utilities for Energy Efficiency (of which Aquila is a member), the Metropolitan Energy Center and the city of Kansas City, Missouri's Weatherization Assistance Program arranged a series of workshops entitled "Save Energy, Save Money Now!" Targeted to homeowners and renters, these workshops offered low or no cost energy efficiency tips to help customers save money on their utility bills. The workshops were free to the public and were held throughout December 2005, January and February 2006 at various locations throughout the Kansas City area. Aquila provided personnel to assist with these workshops.

### "Planning for Energy Efficiency for Today and Tomorrow" Workshops

With support from the Heartland Utilities for Energy Efficiency (of which Aquila is a member), the Community Services League is conducting workshops consisting of education on energy efficiency, weatherization, energy safety tips, and energy conservation targeting individuals that seek assistance for emergency services - utility, food, etc. The Workshops are provided throughout Community Services League offices with locations including Buckner, Blue Springs, Independence, Oak Grove, Grain Valley, as well as Hillcrest Ministries, United Services Community Action Agency locations, Hawthorne Place along with many other social services agencies in the Kansas City Metro Area.

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

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

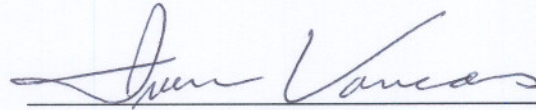
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Case No. ER-\_\_\_\_\_

County of Jackson     )  
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State of Missouri     )

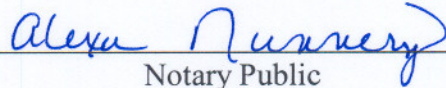
**AFFIDAVIT OF IVAN VANCAS**

Ivan Vancas, being first duly sworn, deposes and says that he is the witness who sponsors the accompanying testimony entitled "Direct Testimony of Ivan Vancas;" 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.



Ivan Vancas

Subscribed and sworn to before me this 3<sup>rd</sup> day of July, 2006.



Notary Public

My Commission expires:

May 4, 2008

