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July 26, 2002

Missouri Public Service Commission
Attn: Secretary of the Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Mo. 65102-0360

FILED³
JUL 26 2002

RE: Case No. GR-2001-382

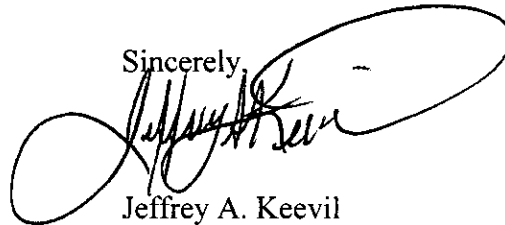
Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case are an original and the appropriate number of copies of a RESPONSE TO ORDER DIRECTING FILING on behalf of Kansas Pipeline Company.

Copies of this filing have on this date been mailed or hand-delivered to counsel of record. Thank you for your attention to this matter.

Sincerely,



Jeffrey A. Keevil

JAK/er
Enclosures
cc: counsel of record

FILED³

JUL 26 2002

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of Missouri Gas Energy's)
Purchased Gas Adjustment Tariff Revisions)
To be Reviewed in its 2000-2001 Actual)
Cost Adjustment.)

Case No. GR-2001-382

RESPONSE TO ORDER DIRECTING FILING

COMES NOW Kansas Pipeline Company ("KPC") and for its Response to the Commission's Order Directing Filing dated July 16, 2002, states as follows:

1. The Commission's Order Directing Filing dated July 16, 2002 ("Order"), allows the parties until August 15, 2002, to make a filing regarding how the filed rate doctrine applies to Staff's proposed MKP/RPC adjustment. Therefore, this Response will not address the filed rate doctrine matter, but KPC may do so in a later filing as provided in the Order.

2. The "Ordered section" of the Order provides that each party shall file a pleading no later than July 26, 2002, indicating (A) "whether this matter should remain open without a procedural schedule pending a final, non-appealable decision on the appeal of the Report and Order that the Commission issued in Case No. GR-96-450" and (B) "whether the Commission should proceed to hear and consider the other issues raised in Staff's recommendation, while awaiting a final decision on the appeal of the Report and Order that the Commission issued in Case No. GR-96-450." Presumably, the phrase "other issues" refers to issues raised in Staff's Recommendation other than the issue

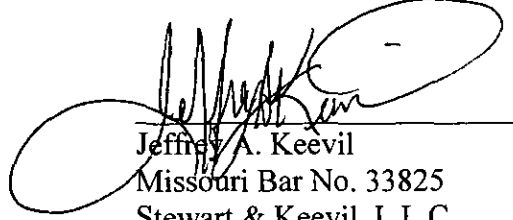
denominated therein as “MKP/RPC Pipeline Adjustment,” and KPC will respond based on that assumption.

3. In regard to (A) in paragraph 2 above, “whether this matter should remain open without a procedural schedule pending a final, non-appealable decision on the appeal of the Report and Order that the Commission issued in Case No. GR-96-450,” KPC believes that the answer is yes, this matter should remain open without a procedural schedule pending a final, non-appealable decision on the appeal of the Report and Order that the Commission issued in Case No. GR-96-450. As the Commission is aware, KPC has filed a pleading in Case Nos. GR-98-167, GR-99-304 and GR-2000-425, in which KPC indicated that each of those cases should be held open without a procedural schedule pending a final, non-appealable judicial resolution of Case No. GR-96-450, including any potential judicial review after a Commission decision on remand thereof, and KPC believes the same is true of the instant case for the same reasons.

4. In regard to (B) in paragraph 2 above, “whether the Commission should proceed to hear and consider the other issues¹ raised in Staff’s recommendation, while awaiting a final decision on the appeal of the Report and Order that the Commission issued in Case No. GR-96-450,” KPC would point out that if the Commission issues an order or orders purporting to decide some issues without deciding all issues in the case, problems regarding the finality of such order(s) may arise which in turn would lead to questions and/or problems concerning the enforceability and/or appealability of such order(s). KPC takes no position on the question as set forth above other than to bring to the Commission’s attention these potential “finality” issues.

¹ Assuming, as stated above, that “other issues” means issues other than what has been denominated as the MKP/RPC Pipeline Adjustment, which encompasses several issues itself depending on what is meant by “issues.”

Respectfully submitted,



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ATTORNEY FOR KANSAS

PIPELINE COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served by placing same in first-class mail, postage paid, or by hand-delivery, to counsel for parties of record on this 26th day of July, 2002.

