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September 13, 1999

FILED³

SEP 13 1999

Missouri Public
Service Commission

VIA HAND DELIVERY

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Room 530
Jefferson City Missouri 65101

Re: GST Steel Company v. Kansas City Power & Light Company
Case No. EC-99-553

Dear Secretary Roberts:

Enclosed for filing in the above-referenced case, please find the following:

**Original and fourteen (14) copies of Joint Motion of GST Steel Company and
Kansas City Power & Light Company for Modification of the Procedural
Schedule**

Thank you in advance for your attention to this matter.

Sincerely,

LATHROP & GAGE L.C.

By:

Kurt U. Schaefer

KUS/sk
Enclosure
cc: To all parties of record

FILED³

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

SEP 13 1999

Missouri Public
Service Commission

GST Steel Company,)	
)	
Complainant)	
v.)	<u>Case No. EC-99-553</u>
)	
Kansas City Power & Light Company,)	
)	
Respondent.)	

**JOINT MOTION OF GST STEEL COMPANY
AND KANSAS CITY POWER & LIGHT COMPANY
FOR MODIFICATION OF THE PROCEDURAL SCHEDULE**

GST Steel Company ("GST") and Kansas City Power & Light Company's ("KCPL") hereby jointly move for modification of the procedural schedule in the above referenced action and in support of this motion state as follows:

1. On June 22, 1999, the Commission issued its *Order Adopting-Procedural Schedule* accepting the joint proposed procedural schedule submitted by the parties.
2. The discovery phase of this proceeding requires extensive review of a significant number of complex documents and issues. The commencement of meaningful discovery was delayed due to discovery disputes between the parties. *See Order Regarding GST Steel Company's First Motion to Compel Discovery and Amending the Procedural Schedule* (July 29, 1999); *Order Regarding KCPL's Motion for Clarification, Reconsideration and Rehearing of the Commission's Order of July 29, 1999, and Regarding GST Steel Company's Second Motion to Compel Discovery* (August 19, 1999).
3. In its July 29, 1999 *Order*, the Commission adjusted GST's due date for filing direct testimony from August 12, 1999 to September 15, 1999 (an extension of 34 days).
4. KCPL filed a motion for clarification seeking adjustment of the other dates of the procedural schedule. In its August 19, 1999 *Order*, the Commission declined to make further adjustment to the procedural schedule until it had heard from all the parties.

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5. GST and KCPL jointly propose that the due date for GST's direct testimony be extended until October 22, 1999. This adjustment represents an extension of 71 days from the original procedural schedule. GST and KCPL respectfully request that the other dates set forth on the procedural schedule be adjusted by a comparable amount of time.

6. The Attorneys for the Staff of the Missouri Public Service Commission has indicated that they do not object to this request.

7. GST and KCPL jointly propose that the Commission adjust the procedural schedule as amended so that it reflects the dates contained in Exhibit A.

WHEREFORE, GST and KCPL request that the Commission issue an order adjusting its procedural schedule as set forth above.

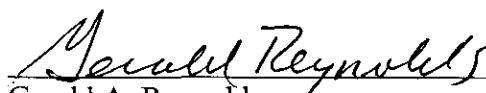
Respectfully submitted,



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Attorney for Kansas City Power & Light

Dated: September 13, 1999

EXHIBIT A

- | | | |
|----|--|-----------------------------|
| 1. | Direct Testimony | October 22, 1999 |
| 2. | Rebuttal Testimony of All Parties | December 17, 1999 |
| 3. | Prehearing Conference | January 5, 2000 |
| 4. | Final List of Issues, Order of Witnesses, Order of Cross-Examination | January 11, 2000 |
| 5. | Surrebuttal Testimony or Cross-rebuttal Testimony, All Parties | February 8, 2000 |
| 6. | Position of Statements of Each Party on All Issues | February 21, 2000 |
| 7. | Evidentiary Hearing | February 28 – March 9, 2000 |

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, postage prepaid, to all counsel of record as shown on the following service list this 13th day of September, 1999.

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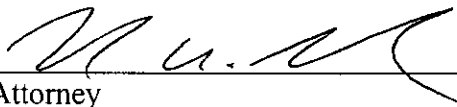
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