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October 18, 1999

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Truman State Office Building, Room 530
PO Box 360
Jefferson City Missouri 65102

Re: Case No. EC-99-553

Dear Judge Roberts:

Enclosed for filing is an original and fourteen (14) copies of **Joint Motion of GST Steel Company and Kansas City Power & Light Company for Modification of the Procedural Schedule.**

Should you have any questions, please feel free to contact me.

Sincerely,

LATHROP & GAGE L.C.

By: 
Kurt U. Schaefer

cc: To all parties of record

FILED²

OCT 18 1999

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²

OCT 18 1999

Missouri Public
Service Commission

GST Steel Company,)
)
Complainant)
v.)
)
Kansas City Power & Light Company,)
)
Respondent.)

Case No. EC-99-553

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 ("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 October 1, 1999 *Order Regarding Kansas City Power & Light Company's First Motion to Compel Discovery and Amending the Procedural Schedule* (the "October 1, 1999 Order"), the Commission revised the procedural schedule in this matter at the joint request of KCPL and GST.

4. Subsequent to the October 1, 1999 Order, GST and KCPL have continued with their discovery efforts, but, given the nature of the issues involved, neither production of requested materials nor evaluation of the voluminous materials produced are complete.

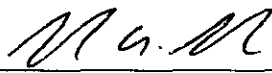
5. GST and KCPL jointly propose that the current procedural schedule be further revised to permit the parties additional time for the preparation of testimony. The parties propose as well that the new schedule retain the hearing dates set in the October 1, 1999 Order.

6. The Attorneys for the Staff of the Missouri Public Service Commission have 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 Appendix A.

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

Respectfully submitted,

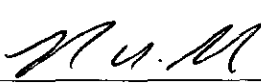


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Dated: October 18, 1999

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APPENDIX A

Proposed Revised Schedule

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|----|--|-----------------------------|
| 1. | Direct Testimony | November 17, 1999 |
| 2. | Rebuttal Testimony of All Parties | January 12, 2000 |
| 3. | Prehearing Conference | January 18, 2000 |
| 4. | Final List of Issues, Order of Witnesses, Order of Cross-Examination | January 25, 2000 |
| 5. | Surrebuttal Testimony or Cross-rebuttal Testimony, All Parties | February 18, 2000 |
| 6. | Position of Statements of Each Party on All Issues | February 25, 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 18th day of October, 1999.

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