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PROFESSIONAL CORPORATION

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March 10, 2000

**FILED<sup>2</sup>**

**MAR 10 2000**

**Missouri Public  
Service Commission**

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 3660  
Jefferson City, Missouri 65102

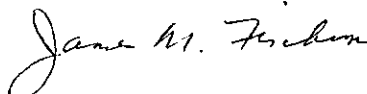
RE: *GS Technology Operating Company, d/b/a GST Steel Company*  
Case No. EC-99-553

Dear Mr. Roberts:

Pursuant to the Commission's February 17, 2000, Order Concerning Show Cause Hearing, the Commission directed the parties to file on or before March 13, 2000, a List of Issues and Order of Witness Examination. Enclosed are the original and fourteen (14) copies of the List of Issues and Order of Witness Examination for filing in the above-referenced matter.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

  
James M. Fischer

/jr  
Enclosures

cc: Paul S. DeFord  
James W. Brew  
Christopher C. O'Hara  
Dana K. Joyce  
Steve Dottheim  
Lera L. Shemwell  
John B. Coffman

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

MAR 10 2000

Missouri Public  
Service Commission

GS Technology Operating Company,  
d/b/a GST Steel Company,

Complainant,

v.

Kansas City Power & Light Company,

Respondent.

Case No. EC-99-553

**List of Issues And Order of Witness Examination**

COME NOW GS Technologies Operating Company, Inc., d/b/a GST Steel Company ("GST"), Kansas City Power & Light Company ("KCPL"), the Commission Staff, and Office of the Public Counsel, and state as follows:

1. On February 17, 2000, the Commission issued its Order Concerning Show Cause Hearing in this matter in which it directed the parties to file, on or before March 13, 2000, a list of issues to be determined by the Commission. The Order also directs the parties to include a list of the witnesses to appear on each day of the hearing and the order in which they shall be called, and the order of cross-examination.

2. The parties have identified the following issues to be determined herein by the Commission:

- a) Have the charges imposed under the GST/KCPL Special Contract been "just and reasonable" over the period of the contract?

b) Has KCPL properly accounted for the insurance proceeds that it has received as a result of the Hawthorn Incident?

c) Does the Commission have the authority to order KCPL to pay GST insurance proceeds received by KCPL as a result of the explosion of the Hawthorn plant? If so, is it reasonable and appropriate to do so?

d) Does the Commission have the authority to order KCPL to recalculate GST's bills under the contract? If so, how should those bills be recalculated (*i.e.*, by using KCPL's incremental costs as if Hawthorn continued to operate)? Is it reasonable and appropriate to do so?

e) Has KCPL operated and maintained its generation units in a reasonable and prudent manner?

f) Has KCPL operated and maintained its distribution and transmission facilities in a reasonable and prudent manner?

g) Should the Commission order a formal Staff investigation into the operation and maintenance of KCPL's generation, transmission and distribution facilities?

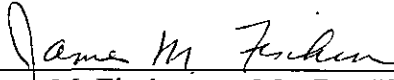
h) Should the Commission delay any decision in this case pending the outcome of the Staff's independent and final report of the boiler explosion at Hawthorn 5?

3. The parties propose the following order of witnesses and cross-examination:

<u>Date</u>	<u>Witness (Party)</u>	<u>Order of Cross-Examination</u>
April 17	(Opening Statements)	
April 17	Steve C. Carver (GST)	Staff, OPC, KCPL
April 17-18	Brian D. Smith (GST)	Staff, OPC, KCPL
April 18	Jerry N. Ward (GST)	Staff, OPC, KCPL
April 18	Dr. Michael S. Proctor (Staff)	OPC, KCPL, GST
April 18-19	Dr. Eve A. Lissik (Staff)	OPC, KCPL, GST
April 19	M. Monica Eldridge (KCPL)	Staff, OPC, GST
April 19	Chris B. Giles (KCPL)	Staff, OPC, GST
April 20	William H. Koegel (KCPL)	Staff, OPC, GST
April 20	Michael E. Bier (KCPL)	Staff, OPC, GST
April 20	Christine M. Davidson (KCPL)	Staff, OPC, GST

4. The parties propose the following order for opening statements: GST, Staff, OPC, and KCPL.

Respectfully submitted,


  
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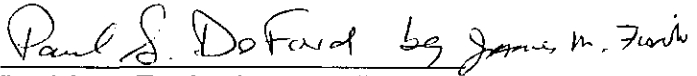
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**Attorney for Office of the Public Counsel**

**CERTIFICATE OF SERVICE**

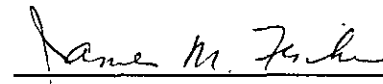
I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, First Class mail, postage prepaid, this 10<sup>th</sup> day of March, 2000, to:

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