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July 1, 1999

Mr. Dale Hardy Roberts
Executive Secretary
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED
JUL 1 1999
Missouri Public
Service Commission

RE: Case No. EX-99-442 Proposed Electric Affiliate Transaction rule
Case No. HX-99-443 Steam Heating Affiliate Transaction rule

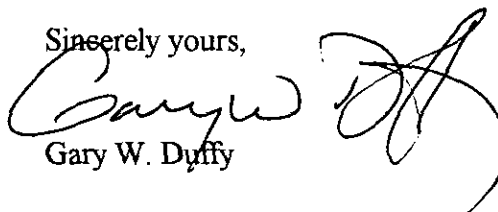
Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and fourteen copies of this letter as the initial comments of UtiliCorp United Inc. and St. Joseph Light & Power Company in the two referenced dockets, as explained below.

UtiliCorp United Inc. and St. Joseph Light & Power Company have joined with other companies in initial comments which are being filed today in Case Nos. GX-99-444 and GX-99-445. The text of the proposed electric affiliate rule in EX-99-445 and the proposed gas affiliate rule in GX-99-444 are quite similar. Rather than file a lengthy document which duplicates the same comments in both the EX and GX cases, UtiliCorp United Inc. and St. Joseph Light & Power Company hereby incorporate by reference their comments in GX-99-444 as their comments in Case No. EX-99-445 to the extent the provisions discussed in the proposed rules are the same or substantially similar.

Similarly, because the text of the proposed steam heating affiliate rule in HX-99-443 is also quite similar, St. Joseph Light & Power Company hereby incorporates by reference in that case the initial comments it is making in GX-99-444 to the extent the provisions discussed are the same or substantially similar.

Sincerely yours,


Gary W. Duffy

cc: Office of Public Counsel