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May 25, 2000

FILED[2]
MAY 25 2000
Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. EM-2000-292 - In the Matter of the Joint Application to UtiliCorp United Inc. and St. Joseph Light & Power Company for Authority to Merge St. Joseph Light & Power Company with and into UtiliCorp United Inc. and, in connection therewith, Certain Other Related Transactions.

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the **LIST OF ISSUES.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Steven Dottheim

Steven Dottheim
Chief Deputy General Counsel
(573) 751-7489
(573) 751-9285 (Fax)

Enclosure
cc: Counsel of Record

FILED[2]

MAY 2 5 2000

Missouri Public Service Commission

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the Joint Application of UtiliCorp United Inc. and St. Joseph Light & Power Company for authority to merge St. Joseph Light & Power Company with and into UtiliCorp United Inc. and, in connection therewith, certain other related transactions.	)	Case No. EM-2000-292

LIST OF ISSUES

The parties submitting this List Of Issues have designated the following issues for the Commission's determination. The descriptions of the issues contained herein are provided for the convenience of the Commission and no party may necessarily be bound by said description which is not intended to constitute evidence. All parties submitting this document agree that this document delineates all areas of disagreement which exist among the parties as of the date of filing this document, which predates the filing of surrebuttal and cross-surrebuttal testimony and schedules. (Surrebuttal and cross-surrebuttal testimony and schedules are not required to be filed before June 26, 2000. As a consequence, parties may not have made the decision yet whether they will file surrebuttal or cross-surrebuttal respecting certain issues/conditions. Thus, parties may not know at this point whether the present list of issues/conditions should reflect any decision on their part to file or not to file surrebuttal or cross-surrebuttal testimony. Furthermore, even if a party may know at this point whether it will file surrebuttal or cross-surrebuttal testimony, the identity of the person(s) who will file such testimony may not have been set yet.) All parties reserve the right to inquire into and establish a position concerning any issue which is pertinent to the proceedings and which arises during the course of the proceedings as a new issue based on matters which could not reasonably have been contemplated based on the filings and pleadings herein as of the date hereof.

Although conditions are set out as separate categories below with their own lists of witnesses, it is the intention of the parties that the conditions will be presented to the Commission at the same time that the subject areas giving rise to the conditions will be presented to the Commission. Conditions under Roman numeral II. may constitute an issue without there being a corresponding subject area set out under Roman numeral I below.

The parties anticipate providing the Commission with revisions of this List of Issues, including revisions of the hearing schedule, at the earliest possible time, as further developments occur.

ISSUES

I. Does the proposed merger and related transactions and proposals satisfy the not detrimental to the public interest standard required for the approval of mergers by the Commission?

The Merger: Companies' Overview of the Transaction and Policy[1]

COMPANIES
Steinbecker
Green

Merger Costs/Benefits

(1) Under reasonable assumptions, do estimated merger savings exceed estimated merger costs?

(2) If under reasonable merger assumptions, estimated merger savings do not exceed estimated merger costs should the merger be approved as being not detrimental to the public interest?

COMPANIES	Staff	AgP
McKinney	Oligschlaeger	Brubaker
	Traxler	

Regulatory Plan - Overall:

(1) Should the Companies' proposed regulatory plan for treating merger related savings and costs in rates be adopted in total as not detrimental to the public interest?

(2) Should SJLP be placed under a rate "moratorium" for Years 1-5 after the closing of the merger?

COMPANIES	STAFF	OPC	AgP
McKinney	Oligschlaeger	Trippensee	Brubaker
	Featherstone	Burdette	
	Traxler	Robertson	
	Proctor	Kind	
	Williams		
	McKiddy		

Acquisition Adjustment:

(1) Should the amortization of one-half of the acquisition adjustment and the return on the unamortized portion of one-half of the acquisition adjustment be treated above-the-line for rate purposes in Years 6-10 following the closing of the merger as the Companies propose?

(2) Should the amortization of the acquisition adjustment begin at the closing of the merger between SJLP and UCU?

[1] As a courtesy to the Companies, Messrs. Green and Steinbecker will stand cross-examination on all of their direct and surrebuttal testimony at the commencement of the evidentiary hearings. Messrs. Green and Steinbecker have submitted direct testimony respecting various issues listed below. Witnesses who have filed rebuttal testimony to Messrs. Green and Steinbecker will stand cross-examination when those discrete issue areas are heard as indicated below. The agreement of the parties to permit Messrs. Green and Steinbecker to testify at one time on the entirety of their testimony and not at that time put on the stand their witnesses that have filed responsive testimony should not be viewed as anything other than as a courtesy extended by the other parties.

(3) Should any portion of the acquisition adjustment ever be included in rates for (a) "recovery of" the acquisition adjustment (amortization of the acquisition adjustment) and (b) "return on" the acquisition adjustment (rate base component of the unamortized balance of the acquisition adjustment)?

COMPANIES	STAFF	OPC	AgP
McKinney	Oligschlaeger	Robertson	Brubaker
	Featherstone	Kind	
	Hyneman		
	Fischer		
	Broadwater		
	Proctor		

Estimated Merger Savings:

(1) Should the Companies' estimate of merger savings and merger costs be relied upon by the Commission in its findings regarding the Merger Application?
(2) Does the Companies' estimate of generation/joint dispatch savings reflect only impacts directly attributable to the merger?
(3) Does the Companies' estimate of merger savings reflect the expected operation of the UCU and SJLP pension plans following closing of the merger?

COMPANIES	STAFF	OPC	AgP
Siemek	Fischer	Robertson	Brubaker
DeBacker	Harris	Kind	
Heider	Traxler		
Browning	Lin		
Kreul	Proctor		

Savings Tracking/Benchmark

(1) Should the Companies' proposal for utilizing a savings tracking system for identifying and quantifying merger related savings in Years 6-10, after the closing of the merger, be adopted?
(2) If the Commission finds that establishing a merger savings tracking system is necessary, should this tracking system be in place for Years 1-5, as well as for Years 6-10, after the closing of the merger?
(3) Should the Companies' proposal for establishing a guaranteed merger revenue requirement benefit to SJLP customers of at least $1.6 million for each year of Years 6-10, following the closing of the merger, be adopted?
(4) If "yes" to question 3 above, what period of time should be used as a "baseline" for the purpose of measuring future merger savings?
(5) Should actual or budgeted amounts be used for purposes of establishing a savings tracking "baseline"?
(6) If a baseline using actual amounts is adopted, what baseline and what adjustments to the "baseline" are appropriate for this purpose?

COMPANIES	STAFF	OPC	AgP
Myers	Fischer	Robertson	Brubaker
DeBacker	Oligschlaeger		
Siemek	Featherstone		
McKinney	Traxler		
	Proctor		
	Broadwater		
	Lin		

Pyatte
Mantle

Frozen Capital Structure:

(1) Should SJLP divisional customer rates in Years 6-10, after the closing of the merger, be calculated, as proposed by the Companies, using the stand-alone SJLP capital structure advocated by the Staff in Case No. ER-99-247?

COMPANIES	STAFF	OPC
McKinney	Broadwater Featherstone	Burdette

Corporate Allocations:

(1) Does the Companies' allocation of escalated corporate overhead costs to the SJLP division represent a reasonable assumption as to an escalation rate to be applied to these allocated costs?

(2) Following the closing of the merger, should MPS divisional customer rates be calculated using levels of UCU corporate overhead allocated costs that assume the non-inclusion of SJLP in the UCU corporate structure?

COMPANIES	STAFF	OPC	AgP
McKinney	Traxler	Robertson	Brubaker

MPS Savings Assignment:

(1) Should no or very little merger savings and costs be reflected in the MPS divisional customer rates after the closing of the merger, as proposed by the Companies?

COMPANIES	STAFF	AgP
McKinney	Oligschlaeger Proctor	Brubaker

Electric Allocations Agreement:

(1) How should the energy costs and profits from off-system sales associated with the joint dispatch of MPS and SJLP power supply resources be allocated between these two post-merger UCU divisions?

(2) Should the Electric Allocations Agreement include the specific calculations for estimating energy cost savings from joint dispatch and increased profits from off-system sales?

COMPANIES	STAFF
DeBacker	Proctor

Transaction Costs:

(1) Should the Companies recover in rates the transaction costs associated with the merger?

(2) If yes to question 1, over what period of time should these costs be amortized into cost of service?

(3) If yes to question 1, what portion of transaction costs should be assigned to nonregulated operations?

COMPANIES	STAFF	OPC
Siemek	Russo Hyneman	Robertson

Costs to Achieve:

(1) Should the Companies recover in rates the "costs to achieve" associated with executive severance payments?

(2) Should the Companies recover in rates the costs of the "paid advisory board"?
(3) Should the Companies recover in rates the costs associated with full funding of SJLP's Supplemental Executive Retirement Plan?
(4) For those "costs to achieve" that are deemed eligible for rate recovery, how should they be accounted for pending consideration in a future general rate proceeding?

COMPANIES	STAFF	OPC	AgP
Siemek	Russo	Robertson	Brubaker
McKinney	Hyneman		
Browning			
Pella			
DeBacker			

Market Power

(1) Will a post-merger UCU possess more horizontal, vertical, or retail market power?
(2) If the answer to Question 1 is yes, will the additional vertical or retail market power possessed by a post-merger UCU be detrimental to the public interest and will the risk of additional horizontal market power possessed by a post-merger UCU be detrimental to the public interest?
(3) Will the merger allow the Companies to take valuable, limited transmission capacity necessary for other Missouri utilities to maintain deliveries under their purchased power contracts?

COMPANIES	STAFF	OPC	SPF
McKinney	Proctor	Kind	Russell

Transmission Access and Reliability

(1) Have the Companies conducted and provided adequate studies of the impact of the proposed merger upon transmission facilities within, and interconnecting with, the State of Missouri, and upon all providers of electric service in the State, to prove that the proposed merger is not detrimental to the public interest?
(2) Will the proposed merger provide the Companies the ability to gain unduly preferential priority of access to limited transmission facilities and/or exercise their post-merger transmission access anti-competitively, to the detriment of other customers in the State and therefore to the detriment of the public?
(3) Could a post-merger UCU refunctionalize its transmission facilities in anti-competitive ways to the detriment of the public?
(4) Do the companies being merged adhere to a single, consistent set of standards for designing and operating their transmission facilities and, if not, would not adhering to a single, consistent set of standards for designing and operating their transmission facilities be detrimental if the merger is approved?

COMPANIES	SPF
Kreul	Russell
McKinney	

Stranded Costs

(1) Would ratepayers be harmed if UCU were allowed to include any portion of the acquisition adjustment in its future calculation of stranded costs?

COMPANIES	STAFF	OPC
McKinney	Oligschlaeger	Robertson

Synergies In Unregulated Operations

(1) Are some of the synergies (e.g., generation) included in the 10-year merger synergy

calculations likely to accrue primarily to shareholders if electric restructuring occurs in Missouri prior to the end of the 10-year period used to calculate the merger synergies?

(2) Will UCU receive additional benefits from the proposed merger that are not reflected in the 10-year merger synergy calculations?

OPC
Kind

Affiliate Transactions

(1) Will UCU's affiliate transactions, as a result of the proposed merger, increase in size and scope and thus become more complex and difficult to monitor, while at the same time it will become more important to monitor such transactions to ensure compliance with standards?

OPC
Kind

Steam/Gas Service

(1) For the steam/gas customers of SJLP, does the analysis of the Companies show that the costs of the proposed merger exceed the savings of the proposed merger?

AgP
Brubaker

Energy Efficiency

(1) Will the proposed merger have a detrimental impact on low-income weatherization and therefore on the public?

(2) Will the proposed merger have a detrimental impact on other energy efficiency assistance and therefore on the public?

(3) Will the proposed merger have a detrimental impact on the use of renewable energy resources and therefore the public?

COMPANIES	DNR
Pella	Randolph
McKinney	Colton
	Jackson

II. If the adoption of conditions by the Commission cannot in the view of particular parties eliminate in total the situation that the proposed merger is detrimental to the public interest, but regardless of this view of particular parties, the Commission decides to approve the proposed merger, should the Commission adopt any or all of the following conditions, as part of its approval of the Companies' merger?

Stranded Costs Condition

(1) Should the Staff's proposed condition regarding elimination of the acquisition adjustment from future stranded cost calculations be adopted?

COMPANIES	STAFF
McKinney	Oligschlaeger

Pension Funds Condition

(1) Should the Staff's proposed condition requiring maintaining the pre-merger funded status of SJLP's pension fund for calculating FAS 87 pension cost, be adopted?

COMPANIES	STAFF
Browning	Traxler

Access to Book and Records Condition

(1) Should the OPC's condition that the merged entity be required to allow OPC and the Staff access to its books, records, employees and officers and those of its wholly owned subsidiaries, be adopted?

COMPANIES	OPC
McKinney	Kind

Affiliate Transactions Condition

(1) Should the OPC's condition that the merged entity be required to agree to comply with the Commission's affiliate transaction rules, be adopted?

COMPANIES	OPC
McKinney	Kind

Income Taxes Condition

(1) Should the Staff's proposed condition regarding customer protections in the event the merger is treated as a "taxable" transaction be adopted?

COMPANIES	STAFF
Karlin	Hyneman

Surveillance Condition

(1) Should the Staff's proposed conditions regarding continued submission of separate "surveillance" reports for UCU and SJLP, following closing of the merger, be adopted?

COMPANIES	STAFF
McKinney	McKiddy

Customer Service Indicators Condition

(1) Should the Staff's proposed conditions regarding measurement, reporting and potential imposition of remedial action concerning certain customer service indicators be adopted?

COMPANIES	STAFF
Pella	Bernsen
	Niemeyer
	Ketter

Gas Supply RFP Condition

(1) Should the Staff's proposed condition regarding use of "request for proposals" for MPS and SJLP gas supply, following closing of the merger, be adopted?

COMPANIES	STAFF
Pella	Allee

Gas Peak Load Study Condition

(1) Should the Staff's proposed condition regarding performance of a peak design day study for SJLP's gas operations, following closing of the merger, be adopted?

COMPANIES	STAFF
Pella	Allee

Market Power Conditions

(1) Respecting vertical market power, should the Staff's condition that the Companies be required to commit to join a single regional transmission entity before the October 15, 2000 deadline of FERC Order No. 2000, be adopted?

(2) Respecting horizontal market power, should the Staff's condition that at the time retail

competition becomes lawful in Missouri the Companies be required to agree to submit a study showing what percentage of load throughout their merged service territory can be served from competitive generation sources, be adopted?

(3) Respecting horizontal market power, should OPC's condition that, the Companies be required to agree that they will be subject to the same Horizontal Market Power Provisions that were approved by the Commission in Case No. EM-97-515 be adopted?
(4) Respecting vertical market power, should OPC's condition that the Companies be required to agree to join a Regional Transmission Organization (RTO) under the same Vertical Market Power Provisions that were approved by the Commission in Case No. EM-97-515 be adopted?
(5) Respecting retail market power, should OPC's condition that the Companies be required to agree that they will be subject to the same Retail Market Power Provisions that were approved by the Commission in Case No. EM-97-515 be adopted?
(6) Respecting horizontal, vertical, and retail market power, should OPC's condition that the Companies be required to agree that they will be subject to the same Market Power Legislation Provisions that were approved by the Commission in Case No. EM-97-515 be adopted?
(7) Respecting transmission capacity, should Springfield's proposed conditions regarding Transmission Access and Reliability (which are set forth in detail herein under the heading "Transmission Access and Reliability Conditions") be adopted?

COMPANIES	STAFF	OPC	SPF
McKinney	Proctor	Kind	Russell

Transmission Access and Reliability Conditions

(1) (a) Should the Commission order the Joint Applicants to conduct production cost, load flow and stability studies of the impact of the proposed merger upon transmission facilities within, and interconnecting with, the State of Missouri, and upon all providers of electric service in the State, prior to approval of the merger and if so, what should such studies contain? (b) Should the Joint Applicants be ordered to provide these studies in hard copy and electronic form to the other parties, and should the Commission keep this case open until such time as the studies have been completed and all parties have been allowed sufficient time to review/analyze and file comments in this case on such studies? (c) Should the Joint Applicants be required to construct and/or upgrade, at their expense, transmission facilities necessary to insure that their integrated operation will not adversely impact others? (d) If the answer to (c) is yes, what transmission facilities?
(2) Should the Commission impose conditions on the merger such that:
   - The Joint Applicants be required by the Commission to commit that with respect to any and all generating resources associated with any one of their existing four control areas (including purchased generating resources) serving load in any other control area of the merging companies, the merging companies should waive or not assert: (i) native load priority on scheduling and curtailing non-firm network transmission service; (ii) the native load preference arguably accorded to bundled retail loads over wholesale loads under the decision in Northern States Power Co. v. FERC, 176 F.3d 1090 (8^{th} Cir. 1999); and (iii) use of any native load priority that will enable any one of the merging companies to import power through constrained interfaces so as to free up its local generating resources for off-system sales?
   - The Joint Applicants not be allowed to combine any or all of their existing control areas without first submitting their plans for such combinations to peer group review and approval by the SPP ISO/RTO and the affected regional reliability councils?
   - The merged companies be required to schedule all power flows and/or reserve

transmission capacity on the relevant OASIS for purposes of carrying out any internal dispatch between what are now four geographically isolated pockets of load and generation in four separate control areas of the merging companies, to implement real-time monitoring of intra-company flows associated with internal dispatch, to report continuously the amount of such flows on its OASIS and to make all reasonable efforts to limit internal dispatch to levels at or below the transmission capacity reserved for purposes of carrying it out?

- If the burdens on Springfield attributable to internal dispatch of the Joint Applicants turn out to be substantial (i.e., a substantial increase in curtailments of Springfield's firm schedules from Montrose), the merged company be required to reimburse Springfield for the incremental costs to Springfield of re-dispatching Springfield's generating resources that are attributable to the post-merger integrated operations of the Joint Applicants' separate systems?
- The merged company be required to put all of its transmission facilities in Missouri and Kansas under the control of the SPP ISO/RTO in a single zone under the SPP transmission tariff and that the merged company join - and maintain membership in - the SPP ISO/RTO and be required to file an integrated open access transmission tariff ("OATT") and an integrated transmission rate for their four control areas in Missouri and Kansas?
- UCU be required to (i) not set aside transmission capacity for Capacity Benefit Margins (CBM) and Transmission Reserve Margins (TRM) and (ii) to waive any future claims for CBM and TRM?

(3) Should UCU be required to not seek refunctionalization of any currently categorized transmission lines of the merging companies that operate at or above 69 kV?
(4) Should the Joint Applicants be required (i) to establish and implement a single standard for transmission system design and operation for the entirety of the merged company and (ii) to comply with the Southwest Power Pool Criteria?

COMPANIES	SPF
Kreul	Russelll
McKinney	

Load Research Condition

(1) Should the Staff's proposed conditions regarding production of load research data, following closing of the merger, be adopted?

COMPANIES	STAFF
Pella	Mantle

Tariff Condition

(1) Should the Staff's proposed condition regarding changes to SJLP's current tariffs, following closing of the merger, be adopted?

COMPANIES	STAFF
McKinney	Beck
Pella	

Gas Safety Program Condition

(1) Should the Staff's proposed condition regarding continuation of SJLP's current gas yard line replacement program, following closing of the merger, be adopted?

COMPANIES	STAFF
Pella	Beck

Fuel Energy Cost Information Condition

(1) Should the Staff's proposed condition regarding the continued provision of separate MPS and SJLP fuel and energy cost information following closing of the merger be adopted?

STAFF
Lin

Energy Conditions

(1) Should the Commission approve DNR's proposed condition that UCU must enter into a partnership with MDNR and other interested parties to market and leverage funds for the development of energy efficiency programs?
(2) Should the Commission approve DNR's proposed condition that UCU must develop or retain low-income service packages to meet customer needs, reduce energy costs and provide a return to UCU?
(3) Should the Commission approve DNR's proposed condition that UCU must offer additional renewable energy options to Missouri customers?
(4) Should the Commission approve DNR's proposed condition that UCU must target outreach to customers that are income eligible and encourage them to take advantage of the opportunity to reduce energy consumption and to improve home affordability?
(5) Should the Commission approve DNR's proposed condition that UCU must amend the cooperative agreement between UCU and Kansas City, Missouri to permit averaging unit cost within the agreement to maximize the opportunity to assist customers?
(6) Should the Commission approve DNR's proposed condition that UCU must eliminate tying the dollar amount to specific measures to maximize the energy conservation measures installed in each home? Should the Commission approve DNR's proposed condition that any energy efficient measure that is deemed cost-effective as a result of computer analysis, as stated in the agreement between UtiliCorp and Kansas City, Missouri, shall be permitted?
(7) Should the Commission approve DNR's proposed condition that UCU must permit energy-efficiency assistance to all eligible households? Should the Commission approve DNR's proposed condition that UCU must allow funds to be spent on non-electric appliances?
(8) Should the Commission approve DNR's proposed condition that UCU must implement a 25-site Benefit Outreach and Screening Software (BOSS) pilot project, and must expand the program, as appropriate, if found to successfully deliver benefits to low-income customers?
(9) Should the Commission approve DNR's proposed condition that UCU must implement a base load and space heating electric energy efficiency program directed toward high use payment-troubled low-income customers?
(10)Should the Commission approve DNR's proposed condition that UCU must implement a pilot solar energy program directed toward high use low-income customers?
(11)Should the Commission approve DNR's proposed condition that UCU must implement a periodic survey process through which the merged company will take pro-active efforts to identify which of its payment-troubled customers represent low-income households?
(12)Should the Commission approve DNR's proposed condition that UCU must implement an Outcome-based Performance Reporting System (OPRS) through which the customer service outcomes to low-income customers can be systematically tracked over time?

COMPANIES	DNR
Pella	Randolph
McKinney	Colton
	Jackson

OPC Regulatory Plan Condition

(1) If the Commission approves the proposed merger, should OPC's regulatory plan be approved?

COMPANIES	OPC
McKinney	Trippensee

ORDER OF CROSS-EXAMINATION

Witness:

UCU	SJLP	Staff	OPC	AgP	SPF	DNR

Cross:

SJLP	UCU	DNR	DNR	DNR	DNR	AgP
UE	UE	AgP	AgP	SPF	AgP	SPF
DNR	DNR	SPF	SPF	OPC	OPC	OPC
AgP	AgP	OPC	Staff	Staff	Staff	Staff
SPF	SPF	UE	UE	UE	UE	UE
OPC	OPC	UCU	UCU	UCU	UCU	UCU
Staff	Staff	SJLP	SJLP	SJLP	SJLP	SJLP

UCU requested that it be shown as a separate party than SJLP for purposes of cross-examination. This matter has not been discussed by the parties and UCU readily acknowledges that no party has agreed or acquiesced to UCU's request.

Schedule Of Issues

Monday, July 10, 2000
- Companies' Overview and Policy
- Merger Costs/Benefits
- Regulatory Plan – Overall
- OPC Regulatory Plan

Tuesday, July 11, 2000
- OPC Regulatory Plan (continued)
- Acquisition Adjustment
- Frozen Capital Structure
- Stranded Costs
- Synergies In Unregulated Operations
- Energy Efficiency
- Affiliated Transactions

Wednesday, July 12, 2000
- Energy Efficiency (continued)
- Corporate Allocations
- MPS Savings Assignment
- Steam/Gas Service

Electric Allocations Agreement
Estimated Merger Savings

Thursday, July 13, 2000
Savings Tracking/Benchmark
Customer Service
Access To Books and Records
Gas Supply RFPs
Gas Peak Load Study
Load Research
Surveillance
Transaction Costs
Costs To Achieve

Friday, July 14, 2000
Costs To Achieve Costs (continued)
Fuel Energy Cost Information
Income Taxes
Gas Safety
Tariff Language
Transmission Access and Reliability
Market Power

Respectfully submitted,

DANA K. JOYCE
General Counsel

Steven Dottheim
Chief Deputy General Counsel
Missouri Bar No. 29149

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Jefferson City, MO 65102
(573) 751-7489 (Telephone)
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 25th day of May 2000.

Service List for
Case No. EM-2000-292
May 25, 2000

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