

ORIGINAL

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July 8, 2002

Missouri Public Service Commission
Attn: Secretary of the Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Mo. 65102-0360

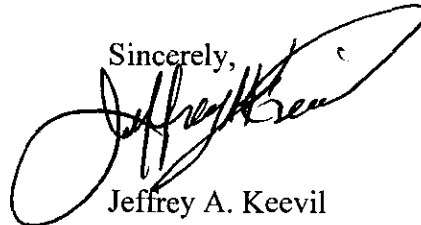
RE: Case No. GR-99-304

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case are an original and the appropriate number of copies of a Motion for Reconsideration or Clarification on behalf of Kansas Pipeline Company.

Copies of this filing have on this date been mailed or hand-delivered to counsel of record. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey A. Keevil", written over a horizontal line.

Jeffrey A. Keevil

JAK/er
Enclosures
cc: counsel of record

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Missouri Gas Energy's)	
Purchased Gas Cost Adjustment Factors)	Case No. GR-99-304
to be Reviewed in its 1998-1999)	
Actual Cost Adjustment)	

MOTION FOR RECONSIDERATION OR CLARIFICATION

COMES NOW Intervenor Kansas Pipeline Company ("Intervenor"), pursuant to 4 CSR 240-2.160, and for this Motion for Reconsideration or Clarification respectfully states as follows:

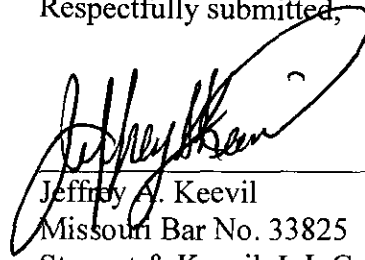
1. On July 2, 2002, the Commission issued, by delegation of authority, its Order Granting Motion for Extension of Time to File Procedural Schedule ("Order"), with an effective date of July 12, 2002, in response to Staff's Motion for Extension of Time to File Procedural Schedule which was filed herein on June 28, 2002.
2. In its Order, the Commission stated that "Staff's motion indicates that the extension of time is needed to allow Staff, and the other parties, an opportunity to respond to a pleading filed on June 27 by [Intervenor]." This is incorrect. Staff's motion indicated that Missouri Gas Energy's ("MGE") response to Staff's recommendation in Case No. GR-2001-382 is due on July 12, 2002, and Staff desires an opportunity to review MGE's response before proposing a procedural schedule herein, for whatever reason. A review of Staff's motion clearly shows that Staff's request for an extension was not motivated by Intervenor's pleading filed on June 27. Staff, and any other parties, should be required to respond to Intervenor's pleading of June 27 within 10 days of June

27 as required by 4 CSR 240-2.080(15); at no time has Intervenor agreed to an extension of this requirement.

3. Intervenor did not object to extending the date for filing a proposed procedural schedule beyond July 1; indeed, as reflected in Intervenor's June 27 pleading, Intervenor believes that it would be premature to file or order any procedural schedule in this case until a final, non-appealable judicial resolution of Case No. GR-96-450, including any potential judicial review after a Commission decision on remand, has been reached. Intervenor did not agree that a procedural schedule should be filed on July 26, 2002, as set forth in the Order and Staff's motion. Instead, as requested in Intervenor's June 27 pleading, the Commission should issue an order ordering that this case be held open without a procedural schedule pending a final, non-appealable judicial resolution of Case No. GR-96-450, including any potential judicial review after a Commission decision on remand thereof. This would obviously alleviate the need to file a procedural schedule on July 26.

WHEREFORE, Intervenor requests the Commission issue an order (i) clarifying that Staff's motion was not motivated by Intervenor's June 27 pleading herein and further (ii) clarifying that Staff and any other parties had 10 days from June 27 in which to respond to Intervenor's June 27 pleading as required by 4 CSR 240-2.080(15) and (iii) reconsidering its Order of July 2, 2002, by ruling on Intervenor's June 27 pleading and ordering that this case be held open without a procedural schedule pending a final, non-appealable judicial resolution of Case No. GR-96-450, including any potential judicial review after a Commission decision on remand thereof, thereby removing the need for the parties to file a proposed procedural schedule herein on July 26, 2002.

Respectfully submitted,



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ATTORNEY FOR KANSAS
PIPELINE COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served by placing same in first-class mail, postage paid, or by hand-delivery, to counsel for parties of record on this 8th day of July, 2002.

