



State of Missouri

John Ashcroft, Governor

Office of the Public Counsel
Harry S Truman Building - Ste. 720
P.O. Box 7800
Jefferson City, Missouri 65102
Telephone 314/751-4857

Douglas M. Brooks
Public Counsel

December 26, 1986

FILED

DEC 26 1986

PUBLIC SERVICE COMMISSION

2102
Mr. Daniel J. Redel
Acting Secretary
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102

Re: Tax Reform Act of 1986,
Case No. AO-87-48

Dear Mr. Redel:

Enclosed for filing please find the original and fourteen copies of Public Counsel's Motion for Extension of Time. Please "file" stamp the extra enclosed copy and return it to this office. I have on this date mailed or hand-delivered copies to all parties of record.

Thank you for your attention to this matter.

Very truly yours,

Richard W. French
Richard W. French
First Assistant Public Counsel

RWF:kr
Enclosures

cc: Parties of record

#D.

FILED

DEC 26 1986

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

PUBLIC SERVICE COMMISSION

In the matter of the investigation of the)
revenue effects upon Missouri utilities of) Case No. AO-87-48
the Tax Reform Act of 1986.)

MOTION FOR EXTENSION OF TIME

Comes now the Office of the Public Counsel (Public Counsel) and for its Motion for Extension of Time in which to file its recommendations addressing procedural alternatives in the above docket hereby states as follows:

1. That on November 3, 1986, this Commission issued an order establishing Docket No. AO-87-48 for the purpose of investigating the effect upon the revenue requirements of utilities of the Tax Reform Act of 1986.

2. That in said November 3, 1986, order, this Commission established a date of January 5, 1987, for the filing by this office and the Staff of the Commission of comments as to the proper procedure to be followed to recognize the revenue effect of the changes in the tax law.

3. That on December 8, 1986, the Staff of the Commission requested an extension of time to file its recommendations to January 9, 1987. This request was granted by the Commission by its order dated December 17, 1986.


4. That Public Counsel hereby requests that it also be granted an extension of time to January 9, 1987, in which to file its comments. Reasons for this request include the demands of the holiday season, the late filings of reports by AT&T Communications and Union Electric and the recent filing of a complaint by the Commission Staff against General Telephone of the Midwest. All of these factors affect the undersigned attorney's ability to prepare, edit and review the comments requested in this docket by the currently established date.

WHEREFORE, Public Counsel requests that this Commission grant its motion to extend the time by which its comments are due in the above docket to January 9, 1987, and for such further relief which to this Commission may seem just and proper.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By


Richard W. French
First Assistant Public Counsel
P. O. Box 7800
Jefferson City, Missouri 65102

I hereby certify that a copy of this motion
has been sent to all parties of record in
Docket No. AO-87-48.

A handwritten signature in dark ink, appearing to read "Michael D. Sand". The signature is written in a cursive style with a horizontal line extending from the end.