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February 9, 1987

Mr. Harvey G. Hubbs
Secretary
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102

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

Dear Mr. Hubbs:

Enclosed for filing in the above-referenced proceeding is an original and fourteen (14) copies of Arkansas Power & Light Company's Motion.

If there are any questions, please let me know.

Sincerely yours,

HAWKINS, BRYDON & SWEARENGEN P.C.

By:

James C. Swearengen
James C. Swearengen

JCS/da
Enclosures
cc: All Parties of Record

FILED

FEB 9 1987

PUBLIC SERVICE COMMISSION

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FILED

FEB 9 1987

PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the investigation)
of the revenue effects upon)
Missouri utilities of the Tax)
Reform Act of 1986.)

Case No. AO-87-48

MOTION

Comes now Arkansas Power & Light Company (hereinafter "AP&L"), by counsel, and for its motion respectfully states as follows:

1. On December 15, 1986, AP&L filed a response to the Commission's order of November 3, 1986, in this docket. A cover letter from Mr. Ralph H. Teed, Jr. accompanied the filing. In that letter, Mr. Teed said:

The Commission's order in the referenced docket requires that the data for calendar year 1985 be submitted by December 15, 1986 and the data for calendar year 1986 be submitted by February 28, 1987. The Company would have had great difficulty providing a cost study for a calendar 1985 test year by the December 15, 1986 deadline, which would have essentially required the preparation and submission of a rate case in six weeks. Because the Company had previously prepared cost of service data for the twelve months ending June 1986, this more current cost data was used to prepare the attached cost of service studies. There have been no significant cost changes between December 1985 and June 1986 which would impact the level of the tax savings. The Company feels the more current June 1986 data is superior to the calendar 1985 data in terms of evaluating the prospective impact of the new tax law.

By the same token, there will be no cost changes between June 1986 and December 1986 which could

significantly change the estimated tax savings. Accordingly, the Company feels the preparation of a second set of cost studies using calendar 1986 data would be redundant as well as expensive and unduly burdensome to the Company and would therefore request to be relieved of the obligation to make the February 18 (sic) filing of 1986 data.

2. On January 30, 1987, the Commission issued an order which, inter alia, granted extensions to UtiliCorp United and Great River Gas Company. All other utilities were ordered to make the calendar year 1986 filing on or before March 2, 1987, and no mention was made of the pending request of AP&L to be relieved of this requirement.

3. AP&L's position with regard to filing calendar year 1986 information is unchanged from the statements made by Mr. Teed on December 15, 1986. AP&L has filed information which covers the first half of 1986, and reiterates that there were no cost changes between June 1986 and December 1986 which would significantly change the estimated tax savings. Therefore, AP&L believes that it has already provided information which is sufficiently complete for purposes of the proceedings contemplated in the Order of January 30, 1987.

WHEREFORE, for the above-stated reasons, AP&L moves the Commission to issue an order stating that AP&L is relieved of the requirement of filing calendar year 1986 data by March 2, 1987, and specifically relieved of any obligations set forth in ORDERED:2 and ORDERED: 8 of the Order of January 30, 1987.

Respectfully submitted,



James C. Swearengen

Gary W. Duffy

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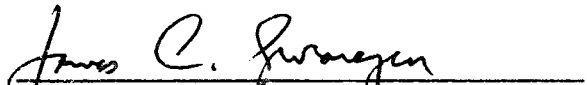
Jefferson City, Missouri 65102

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Attorneys for Arkansas Power &
Light Company

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing document was served on counsel for all parties to the above-referenced dockets by depositing a copy of same with the United States Postal Service this 9th day of February, 1987, at Jefferson City, Missouri.


James C. Swearengen