

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED<sup>2</sup>

JAN 13 2000

Missouri Public  
Service Commission

GST Steel Company, )  
)  
Complainant )  
v. )  
)  
Kansas City Power & Light Company, )  
)  
Respondent. )

Case No. EC-99-553

**MOTION TO FILE RESPONSE OF GST STEEL COMPANY  
TO ORDER TO SHOW CAUSE 45 MINUTES OUT OF TIME**

1. By Order to Show Cause dated January 6, 2000, the Commission required GST Steel Company ("GST") to respond with written suggestions no later than 3:00 p.m. on Thursday, January 13, 2000.

2. Despite diligent attempts to comply with the 3:00 p.m. deadline, because of the numbers of attorneys and amount of information necessary to appropriately respond, it is impossible to file the response by 3:00 p.m.

3. The filing of GST's response 45 minutes out of time will not prejudice any of the parties or the Commission.

**WHEREFORE**, GST respectfully requests to file, and that the Commission accept, its Response of GST Steel Company to Order to Show Cause approximately 45 minutes out of time.

Respectfully submitted,

  
Paul S. DeFord Mo. #29509  
Kurt U. Schaefer Mo. #45829  
**LATHROP & GAGE, L.C.**  
2345 Grand Boulevard  
Suite 2800  
Kansas City, Missouri 64108  
Telephone: 816-292-2000  
Facsimile: 816-292-2001

James W. Brew  
Christopher C. O'Hara  
**BRICKFIELD, BURCHETTE & RITTS, P.C.**  
1025 Thomas Jefferson Street, NW  
8<sup>th</sup> Floor, West Tower  
Washington, D.C. 20007  
Phone: (202) 342-0800  
Facsimile: (202) 342-0807

Attorneys for GST Steel Company

Dated: January 13, 2000

82

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, postage prepaid, to all counsel of record as shown on the following service list this 13th day of January, 2000.

Gerald A. Reynolds  
KCP&L  
1201 Walnut Street  
Kansas City, MO 64106

Steven Dottheim  
Chief Deputy General Counsel  
MO Public Service Commission Staff  
P.O. Box 360  
Jefferson City, MO 65102

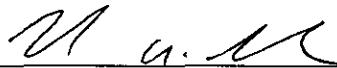
James M. Fischer  
James M. Fischer, P.C.  
101 West McCarty, Suite 215  
Jefferson City, MO 65101

Lera Shemwell  
Assistant General Counsel  
MO Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

John B. Coffman  
Deputy Public Counsel  
Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

Office of Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

Karl Zobrist  
Blackwell Sanders Peper & Martin LLP  
P.O. Box 419777  
Kansas City, MO 64141-6777

  
\_\_\_\_\_  
Attorney