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January 23, 2001

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

RE: Case No. GR-99-435

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION TO SUSPEND ORDER TO FILE PROPOSED PROCEDURAL SCHEDULE.**

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,

Dennis L. Frey
Associate General Counsel
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Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

JAN 23 2001

Missouri Public
Service Commission

In the Matter of Missouri Public Service's)
Purchased Gas Adjustment Factors to be)
Reviewed in its 1998-1999 Actual Cost)
Adjustment.)

Case No. GR-99-435

MOTION TO SUSPEND ORDER TO FILE PROPOSED PROCEDURAL SCHEDULE

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its *Motion to Suspend Order to File Proposed Procedural Schedule*, respectfully states as follows:

1. On September 1, 2000, following its audit of the Actual Cost Adjustment ("ACA") period in this case, the Staff filed its Recommendation requesting, in pertinent part, that the Commission issue an Order requiring Missouri Public Service ("MPS" or "Company"), a division of UtiliCorp United, Inc., to: a) adjust the ACA account balances for each of its three systems in the Company's 1998-1999 ACA filing; and b) comply with a number of recommendations related to system reliability

2. On October 5, 2000, MPS filed its Response to Staff Recommendation, wherein the Company expressed reservations concerning Staff's recommendation as to the appropriate accounting methodology for pipeline imbalances. MPS also took issue with Staff Recommendation 2-c, requiring that MPS "estimate the reserve margin for the 1999/2000 ACA period and for three to five years beyond that." The Company suggested that two years would be a more reasonable time frame.

3. On October 23, 2000, in response to an October 10, 2000 Commission Order, the Staff filed its Response to the aforementioned Company Response. The Staff indicated that it had reached agreement with MPS on all of the issues raised in Staff's September 1, 2000 Recommendation, with the exception of the proper methodology to be used in pricing pipeline imbalances. In addition, the Staff recommended that this case be held open, pending an investigation into allegations involving UtiliCorp United, Inc.'s Gas Supply Services Department (Case No. GO-2001-249), and further recommended that the Commission issue an order resolving the other issues in the instant case.

4. In an Order issued December 6, 2000, the Commission declined to issue the partial order recommended by Staff, and instead directed that a prehearing conference be held at 10:00 a.m. on January 16, 2001, and that the parties file a proposed procedural schedule by January 23, 2001.

5. At the prehearing conference, the parties asserted that it would be premature to file a proposed procedural schedule at this time, inasmuch as the time when the aforementioned investigation will be concluded remains a very open question. The presiding RLJ granted permission for Staff to file a motion to that effect in lieu of the proposed procedural schedule.

6. A Commission Order was issued in GO-2001-249 on November 9, 2000. The Order directed the Staff to investigate allegations contained in an anonymous letter received by the Chair of the Commission on September 9, 2000, to the effect that UtiliCorp has been increasing corporate profits at the expense of MPS ratepayers through the use of put and call options and capacity release. The allegations could significantly affect the 1998/1999 ACA audit for MPS. In order, then, for Staff to be able to complete a credible and accurate audit, it is essential that the results of that investigation be known. Furthermore, at the present time, there is

no reason to believe that the subject investigation will be concluded any time soon. Staff Data Request Nos. 1-41 were recently received on January 9, 2001, and a second set of Data Requests (Nos. 1-29) is not due until February 7, 2001. In addition to Staff's review of those DR responses, it is anticipated that depositions will also be required. With so much uncertainty regarding time of completion of the investigation, Staff submits that it is virtually impossible for the parties to propose a meaningful procedural schedule at this early juncture.

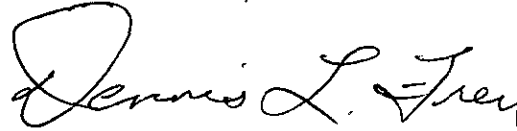
7. The Staff would note that any delays in the resolution of GO-2001-249 will not affect Staff's ongoing efforts to resolve the dispute over the appropriate methodology for the calculation of pipeline imbalances. Staff is optimistic that the dispute will be resolved prior to the conclusion of the investigation, and that as a result, there will be no need for a hearing regarding this issue.

8. Following the receipt and evaluation of the required information from GO-2001-249, if: a) the pipeline imbalance issue is resolved, and b) no other issues are raised as a result of said investigation, Staff proposes to file a supplemental recommendation to close this case. Alternatively, if the dispute over methodology has not been resolved by that time, and/or if additional issues affecting the subject 1998/1999 audit are raised, the Staff proposes to file a request that the Commission schedule another early prehearing conference.

WHEREFORE, for the reasons stated, the Staff respectfully moves that the Commission issue an Order suspending the requirement that the parties file a procedural schedule in this case by January 23, 2001.

Respectfully submitted,

DANA K. JOYCE
General Counsel

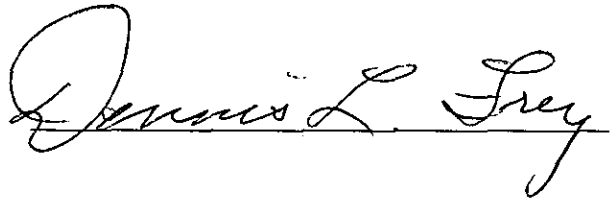


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Certificate of Service

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 23rd day of January 2001.



**Service List for
Case No. GR-99-435
Revised: January 22, 2001 (ccl)**

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