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April 26, 2000

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

FILED²

APR 26 2000

Missouri Public
Service Commission

Re: Case No. EM-2000-292

Dear Mr. Roberts:

Enclosed for filing in the referenced case on behalf of UtiliCorp United Inc., please find an original and fourteen copies of a Motion to Substitute Witnesses and To File Related Direct Testimony.

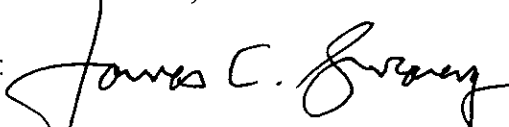
Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

I thank you in advance for your cooperation in this matter.

Sincerely yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:


James C. Swearengen

JCS/lar

Enclosure

cc: All Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

APR 26 2000

Missouri Public
Service Commission

In the matter of the Joint Application of)
UtiliCorp United Inc. and St. Joseph Light)
& Power Company for authority to merge)
St. Joseph Light & Power Company with)
and into UtiliCorp United Inc. and, in)
connection therewith, certain other related)
transactions.)

Case No. EM-2000-292

MOTION TO SUBSTITUTE WITNESSES
AND TO FILE RELATED DIRECT TESTIMONY

COMES NOW UtiliCorp United Inc. ("UtiliCorp"), by and through its counsel, and for its Motion respectfully states as follows to the Missouri Public Service Commission ("Commission"):

1. On October 19, 1999, UtiliCorp caused to be filed in this case, among other things, the direct testimony of Robert W. Holzwarth and the direct testimony of Dan J. Streek.

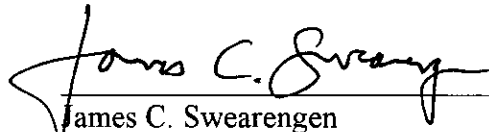
2. Mr. Holzwarth has recently been transferred to a work location in Calgary, Alberta, Canada and is therefore no longer able to take part in these proceedings. In addition, Mr. Streek is now employed by UtiliCorp's Missouri-based Aquila Energy subsidiary.

3. In view of the foregoing, UtiliCorp desires that Mr. Frank A. DeBacker be allowed to adopt the previously filed testimony of Mr. Holzwarth and that Mr. Jerry D. Myers be allowed to adopt the previously filed testimony of Mr. Streek. In connection therewith, UtiliCorp proposes that the Commission permit the filing of certain direct testimony of Mr. DeBacker and Mr. Myers, which testimonies are made a part of this Motion as Attachments 1 and 2 respectively. Mr. DeBacker is fully qualified and prepared to adopt Mr. Holzwarth's testimony as his own. Likewise, Mr. Myers is fully qualified and prepared to adopt Mr. Streek's testimony as his own.

4. The granting of this request will not delay this proceeding or prejudice any party.

WHEREFORE, UtiliCorp moves that the Commission issue its order permitting the substitution of witnesses as described herein and the filing of the related direct testimony.

Respectfully submitted,



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Attorneys for UtiliCorp United Inc.

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered, on this 26th day of April, 2000, to all parties of record.

