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May 5, 2000

Missouri Public Service Commission

VIA FEDERAL EXPRESS

Mr. Dale Roberts **Executive Secretary** Missouri Public Service Commission 301 W. High Street, Suite 530 Jefferson City, MO 65101

TE-2000-746

MAY 0 9 2000

RE:

In the Matter of the Motion of Network Plus, Inc. Requesting Leave to File 1999

Annual Report with the Missouri Public Service Commission

Dear Mr. Roberts:

Please find enclosed for filing the original and 14 copies of Network Plus, Inc.'s motion for leave to file its 1999 Annual Report after the April 15, 2000 deadline.

By copy of this letter, two copies of the enclosed have been forwarded to the Office of Public Counsel and one copy of the enclosed to the Office of General Counsel via Federal Express. I have enclosed two additional copies of the motion and would appreciate your stamping those "filed" and returning them to me in the enclosed return envelope.

If you have any questions or concerns, please feel free to contact me.

Very truly yours,

Todd M. McGuire

Enclosures

Office of Public Counsel (w/encl.) (via Federal Express) cc: Office of General Counsel (w/encl.) (via Federal Express)

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

FILED³
MAY 0 9 2000

		Service Commission
IN THE MATTER OF THE MOTION)	-0 Commission
OF NETWORK PLUS, INC. REQUESTING)	
LEAVE TO FILE 1999 ANNUAL REPORT	j j	CASE NO. <u>TE-2000-746</u>
WITH THE MISSOURI PUBLIC SERVICE	j j	
COMMISSION	j j	

MOTION FOR LEAVE TO FILE 1999 ANNUAL REPORT

Network Plus, Inc., by and through its undersigned counsel, moves the Missouri Public Service Commission to grant it leave to file its 1999 Annual Report after the April 15, 2000 deadline. In support of this motion, Network Plus, Inc. states as follows:

- 1. On April 17, 2000, Network Plus, Inc. ("Network Plus") mailed its 1999 Annual Report to the Missouri Public Service Commission (the "Commission"). On April 24, 2000, the Commission returned the 1999 Annual Report and stated that it was being returned for two reasons. First, the Commission indicated that Network Plus needed to provide its financial information directly on the annual report form, rather than on attached pages, and, second, that Network Plus needed to have a Missouri attorney submit an original, plus 14 copies of a pleading requesting an extension of time to file its 1999 Annual Report.
- 2. Because the April 15, 2000 deadline fell on a Saturday, Network Plus believed that it had complied with the Commission's deadline by having its Annual Report postmarked on the next business day, April 17, 2000. Based on Network Plus's conversation with a member of the Commission staff, Network Plus now understands that its belief that it had complied with the filing deadline was erroneous. Network Plus now respectfully requests leave to file the attached 1999 Annual Report after the April 15, 2000 deadline.

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The attached 1999 Annual Report now complies with this requirement.

WHEREFORE, Network Plus, Inc. respectfully requests that the Missouri Public Service Commission grant it leave to file the attached 1999 Annual Report.

SONNENSCHEIN NATH & ROSENTHAL

Mark P. Johnson - MO Bar #30740

Todd M. McGuire - MO Bar #51361

4520 Main Street, Suite 1100 Kansas City, Missouri 64111

Tel: (816) 460-2400 Fax: (816) 531-7545

ATTORNEYS FOR NETWORK PLUS, INC.

VERIFICATION

STATE OF MISSOURI)	
) ss	
COUNTY OF JACKSON)	

COMES NOW Todd M. McGuire, being of lawful age and duly sworn, swears and affirms as follows:

- 1. My name is Todd M. McGuire, and I am the attorney for Network Plus, Inc. In that capacity I am authorized to verify this Motion and the information contained therein on behalf of Network Plus, Inc.
- 2. The information contained herein is true and accurate to the best of my knowledge and belief.

Todd M. McGuire

Subscribed and sworn to before me this 5^{t} day of May, 2000.

Notary Public

My Commission Expires:

CARMEN M. WESSON
Notary Public - Notary Seal
STATE OF MISSOURI
Clay County

My Commission Expires: March 23, 2004

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 5th day of May, 2000, two true and correct copies of the above and foregoing were mailed via Federal Express to:

Office of Public Counsel 301 West High Street Suite 250 Jefferson City, Missouri 65101

With one copy being forwarded via Federal Express on the same date to:

Office of General Counsel Missouri Public Service Commission 301 West High Street Room 530 Jefferson City, Missouri 65101

ATTORNEY FOR NETWORK PLUS, INC.