

LAW OFFICES
BRYDON, SWEARENGEN & ENGLAND
PROFESSIONAL CORPORATION

DAVID V.G. BRYDON
JAMES C. SWEARENGEN
WILLIAM R. ENGLAND, III
JOHNNY K. RICHARDSON
GARY W. DUFFY
PAUL A. BOUDREAU
SONDRA B. MORGAN
CHARLES E. SMARR

312 EAST CAPITOL AVENUE
P.O. BOX 456
JEFFERSON CITY, MISSOURI 65102-0456
TELEPHONE (573) 635-7166
FACSIMILE (573) 635-0427

DEAN L. COOPER
MARK G. ANDERSON
TIMOTHY T. STEWART
GREGORY C. MITCHELL
RACHEL M. CRAIG
BRIAN T. MCCARTNEY
DALE T. SMITH

OF COUNSEL
RICHARD T. CIOTTONE

November 23, 1999

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

Re: Case No. EM-2000-292

Dear Mr. Roberts:

Enclosed for filing on behalf of UtiliCorp United Inc. and St. Joseph Light & Power Company, please find an original and fourteen copies of Motion to Establish Response Date.

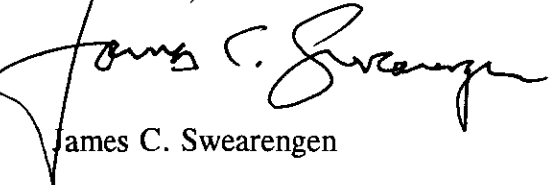
Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

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

Sincerely yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:


James C. Swearngen

JCS/lar

Enclosure

cc: Parties of Record

FILED²

NOV 23 1999

Missouri Public
Service Commission

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

FILED²

NOV 23 1999

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 ESTABLISH RESPONSE DATE

COME NOW UtiliCorp United Inc. ("UtiliCorp") and St. Joseph Light & Power Company ("SJLP"), by and through its counsel, and for their Motion to Establish Response Date respectfully state as follows to the Missouri Public Service Commission ("Commission"):

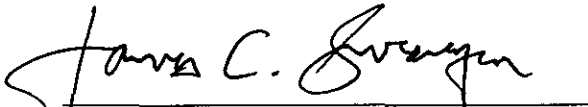
1. On or about November 19, 1999, the Office of the Public Counsel ("OPC") filed in the caption docket its Motion to Require Market Power Study. On November 22, 1999, the OPC filed its response to the Motion to Establish Procedural Schedule previously filed by UtiliCorp and SJLP. Also on November 22, 1999, the Commission issued its Order Setting an Early Prehearing Conference in this matter, said prehearing conference to be held on December 6, 1999. By that same order, the Commission indicated that responses to the UtiliCorp/SJLP Motion to Establish Procedural Schedule filed would be due on November 25, 1999. UtiliCorp and SJLP anticipate that the Commission Staff and possibly other Intervenors will file a response to their Motion to Establish Procedural Schedule and will possibly file other motions.

2. UtiliCorp and SJLP desire the opportunity to respond to all of said pleadings and would like to do so in a single document prior to the December 6, 1999 prehearing conference. Accordingly, UtiliCorp and SJLP desire that the Commission issue its order granting UtiliCorp and

SJLP up to and including Friday, December 3, 1999, to file their response to the pleadings of the other parties. UtiliCorp and SJLP will electronically transmit or fax their response to all parties on that date.

WHEREFORE, UtiliCorp and SJLP respectfully move the Commission to grant the relief requested in paragraph 2 supra.


Respectfully submitted,



James C. Swearingen #21510
Paul A. Boudreau #33155
Brydon, Swearingen & England P.C.
P.O. Box 456
Jefferson City, MO 65102-0456
Telephone (573) 635-7166
Facsimile (573) 635-0427
E-Mail PBoudreau@mail.ultraweb.net

Karl Zobrist #28325
Christine Egbarts #45773
Blackwell Sanders Peper Martin LLP
Two Pershing Square, 2300 Main, Suite 1100
Kansas City, MO 64108
Telephone (816) 983-8000
Facsimile (816) 983-8080
E-Mail Kzobrist@bspmlaw.com

Attorneys for UtiliCorp United Inc.



Gary L. Myers #26896
Vice President, General Counsel
and Secretary
St. Joseph Light & Power Company
520 Francis Street
P.O. Box 998
St. Joseph, MO 64502

Mark W. Comley #28847
601 Monroe Street
Jefferson City, MO 65101
Telephone (573) 634-2266
Facsimile (573) 636-3306
E-Mail Comley@ncrpc.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was forwarded by first class mail or hand-delivered to all parties of record on this 23rd day of November, 1999.

