



Commissioners

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Chair

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Vice Chair

CONNIE MURRAY

ROBERT G. SCHEMENAUER

KELVIN L. SIMMONS

Missouri Public Service Commission

POST OFFICE BOX 360
JEFFERSON CITY, MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
<http://www.psc.state.mo.us>

September 5, 2000

BRIAN D. KINKADE
Executive Director

GORDON L. PERSINGER
Director, Research and Public Affairs

WESS A. HENDERSON
Director, Utility Operations

ROBERT SCHALLENBERG
Director, Utility Services

DONNA M. KOLILIS
Director, Administration

DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

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

FILED²
SEP 6 2000
Missouri Public
Service Commission

RE: Case No. EM-2000-292 – In the matter of the Joint Application of UtiliCorp United, Inc. and St. Joseph Light & Power Company for authority to merger St. Joseph Light & Power Company with and into UtiliCorp United, Inc. and, in connection therewith, certain other related transactions.

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **NOTICE THAT STAFF HAS NOT TIMELY FILED STAFF'S INITIAL BRIEF.**

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,

Steven Dottheim

Deputy General Counsel

(573) 751-7489

(573) 751-9285 (Fax)

Enclosure

cc: Counsel of Record

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

FILED²
SEP 6 2000

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

Missouri Public
Service Commission

**NOTICE THAT STAFF HAS NOT
TIMELY FILED STAFF'S INITIAL BRIEF**

COMES NOW the Missouri Public Service Commission Staff (Staff) and notifies the Missouri Public Service Commission (Commission) and the parties as follows:


1. The Staff's Initial Brief was due at 3:00 p.m., September 5, 2000.
2. Due to the press of other Commission matters as well as unplanned for difficulties in assembling into a single document numerous sections drafted by different authors using different formatting, the Staff was unable to timely file Staff's Initial Brief in this case.
3. The delay in the Staff's submission to the Commission for filing of its Initial Brief was not done for the purpose of delay or to cause prejudice to any party. Staff is attempting to file the Staff's Initial Brief as close to the Commission's filing deadline as possible.
4. The undersigned counsel apologizes for the inconvenience to the Commission, Regulatory Law Judge, and parties to this proceeding.
5. The Staff will file a motion seeking leave to late file the Staff's Initial Brief and, contemporaneously, the Staff will submit Staff's Initial Brief to the Commission for filing.

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WHEREFORE, the Staff notifies the Commission and the parties that the Staff has not timely filed its Initial Brief.

Respectfully submitted,

DANA K. JOYCE
General Counsel



Steven Dottheim
Chief Deputy General Counsel
Missouri Bar No. 29149

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7489 (Telephone)
(573) 751-9285 (Fax)

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 5th day of September, 2000.



**Service List for
Case No. EM-2000-292
September 5, 2000**

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

James Swearengen/Paul Boudreau
Brydon, Swearengen & England, PC
PO Box 456
Jefferson City, MO 65102

Karl Zobrist/Christine Egbarts
Blackwell Sanders Peper Martin LLP
Two Pershing Square, 2300 Main, Ste. 1100
Kansas City, MO 64108

Stuart Conrad
Finnegan, Conrad & Peterson, LC
3100 Broadway, Ste. 1209
Kansas City, MO 64111

Shelley Woods/Jeremiah Nixon
Assistant Attorney General
PO Box 899
Jefferson City, MO 65102

Jeffrey Keevil
Stewart & Keevil, LLC
1001 Cherry St., Ste. 302
Columbia, MO 65201

James Cook
Ameren Services Company
1901 Chouteau Ave., PO Box 66149 (MC1310)
St. Louis, MO 63166-6149

Gary Myers, Vice President,
General Counsel, & Secretary
St. Joseph Light & Power Company
PO Box 998
St. Joseph, MO 64502

Mark Comley
601 Monroe St., Ste. 301
Jefferson City, MO 65101