



Commissioners
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Missouri Public Service Commission

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April 2, 2002

ROBERT J. QUINN, JR.
Executive Director
WESS A. HENDERSON
Director, Utility Operations
ROBERT SCHALLENBERG
Director, Utility Services
DONNA M. PRENGER
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

FILED³
APR 02 2002

RE: Case No. GR-2000-425

Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION FOR LEAVE TO FILE RESPONSE OUT OF TIME.**

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,

Thomas R. Schwarz, Jr.
Thomas R. Schwarz, Jr.
Deputy General Counsel
(573) 751-5239
(573) 751-9285 (Fax)

TRS:sw
Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

APR 02 2002

Missouri Public
Service Commission

In the Matter of Missouri Gas Energy's)
Purchased Gas Adjustment Factors to be)
Reviewed in Its 1999-2000 Actual Cost)
Adjustment.)

Case No. GR-2000-425

MOTION FOR LEAVE TO FILE RESPONSE OUT OF TIME

COMES NOW Staff of the Missouri Public Service Commission and asks for leave to file its response to MGE's December 27, 2001 Response and Motion to Dismiss or Strike. In support of its motion Staff states:

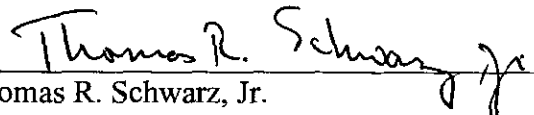
1. On or about November 27, 2001 the Staff filed its recommendation in this case that reviews MGE's 1999/2000 Actual Cost Adjustment period.
2. MGE filed its response on December 27, 2001, seeking among other things to strike or dismiss Staff's recommendation concerning a reliability report.
3. The Commission has not yet ordered a procedural schedule in this case, so no party will be prejudiced by permitting Staff to file its response out of time.

WHEREFORE, Staff asks the Commission to grant it leave to respond to MGE's Motion to Dismiss or Strike.

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Respectfully submitted,

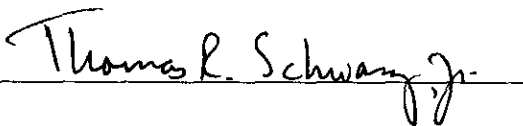
DANA K. JOYCE
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Certificate of Service

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 2nd day of April, 2002.



**Service List for
Case No. GR-2000-425
Revised: April 2, 2002 (SW)**

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Jefferson City, MO 65102**

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