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October 31, 2000

OCT 3 1 2000

Service Commission

Mr. Dale Hardy Roberts Public Service Commission P. O. Box 360 Jefferson City, MO 65102

RE: UtiliCorp United Inc. - Case No. GR-2000-520

Dear Mr. Roberts:

DAVID V.G. BRYDON

PAUL A. BOUDREAU

SONDRA B. MORGAN CHARLES E. SMARR

GARY W. DUFFY

JAMES C. SWEARENGEN

WILLIAM R. ENGLAND, III

JOHNNY K. RICHARDSON

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of a Motion for Variance. Please stamp the enclosed extra copy "filed" and return same to me.

Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

lan Cooper by Rg

By:

Dean L. Cooper

DLC/rhg Enclosures

cc:

Office of the Public Counsel

Doug Micheel, OPC Lera Shemwell, PSC

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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Service Commission	ic
Case No. GR-2000-520	Sion

In the Matter of Missouri Public Service's Purchased Gas Adjustment factors to be reviewed in its 1999-2000 Actual Cost Adjustment.

MOTION FOR VARIANCE

Comes now UtiliCorp United Inc. ("UtiliCorp") d/b/a Missouri Public Service ("MPS"), in accordance with Commission Rule 4 CSR 240-2.060(11), and as its motion for variance from a provision of MPS's P.S.C. No. 5, 4th Revised Sheet No. 34, states to the Missouri Public Service Commission ("Commission") as follows:

GENERAL BACKGROUND

- 1. UtiliCorp is a Delaware corporation, in good standing in all respects, with its principal office and place of business at 911 Main Street, Suite 3000, Kansas City, Missouri 64105. UtiliCorp is authorized to conduct business in Missouri through its MPS operating division and as such is engaged in providing electrical and natural gas utility service in its service areas subject to the jurisdiction of the Commission. A certified copy of MPS's Certificate of Corporate Good Standing-Foreign Corporation and fictitious name registration as issued by the Secretary of State of the State of Missouri was previously filed with the Commission in Case No. EM-2000-292 and is hereby incorporated by reference in accordance with 4 CSR 240-2.060(1)(G). MPS has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates. MPS has no annual report or assessment fees which are overdue.
 - 2. All correspondence, communications, notices, order and decisions of the Commission

with respect to this matter should be sent to:

Karen Russell UtiliCorp United Inc. 7101 Mercy Road Suite 400 Omaha NE 68106 (402) 926-5273 (402) 996-9773 facsimile

Dean L. Cooper BRYDON, SWEARENGEN & ENGLAND P.C. 312 E. Capitol Avenue P. O. Box 456 Jefferson City, MO 65102 (573) 635-7166 (573) 635-0427 facsimile

VARIANCE

- 3. MPS's P.S.C. Mo. No. 5, 4th Revised Sheet No. 34 requires that it make two scheduled PGA filings each year and permits one unscheduled PGA filing during each winter period. The winter PGA is to be filed between October 15 and November 4 each year.
- 4. Due to Staff turnover, MPS will not have its filing prepared until Friday, November 3, 2000. Because November 4 is a Saturday, the filing will not be received by the Commission and "filed" until November 6, 2000. Consequently, MPS desires a waiver from its tariff to allow for the filing on its winter PGA on Monday, November 6, 2000.
- 5. No party should be prejudiced by this waiver. The waiver would move the filing date only one business day later and should not significantly change any action that might be taken as a result of the filing.

WHEREFORE, MPS requests a Commission order:

a) granting MPS a variance from its P.S.C. Mo. No. 5, 4th Revised Sheet No. 34 in order to allow the filing of its winter PGA on November 6, 2000, rather than November 4, 2000; and,

b) granting such further relief as may be necessary which is consistent with the relief requested herein.

Respectfully submitted,

Dean L. Cooper

MBE #36592

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ATTORNEYS FOR UTILICORP UNITED INC. D/B/A MISSOURI PUBLIC SERVICE

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was either hand-delivered or mailed, U.S. Mail, postage prepaid, on the day of October, 2000, to: Lera Shemwell, Missouri Public Service Commission, Governor Office Building, Jefferson City, Mo 65101; and, Douglas Micheel, Office of the Public Counsel, 6th Floor, Governor Office Building, Jefferson City, Mo 65101.