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May 3, 2001

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Missouri Public Service Commission  
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Jefferson City, MO 65102

**FILED<sup>3</sup>**  
MAY 03 2001  
Missouri Public  
Service Commission

**RE: Case No. GR-2000-520/GR-2001-461**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **JOINT PROPOSED PROCEDURAL SCHEDULE AND MOTION TO CONSOLIDATE**.

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,

*Robert V. Franson*

Robert V. Franson  
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RVF:ccl  
Enclosure  
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>3</sup>  
MAY 03 2001  
Missouri Public  
Service Commission

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

Case No. GR-2000-520

In the Matter of Missouri Public Service's )  
Purchased Gas Adjustment factors to be )  
reviewed in its 2000-2001 Actual Cost )  
Adjustment. )

Case No. GR-2001-461

**JOINT PROPOSED PROCEDURAL SCHEDULE AND MOTION TO  
CONSOLIDATE**

**COMES NOW** Missouri Public Service ("Company"), Staff of the Missouri Public Service Commission ("Staff") and the Office of the Public Counsel ("Counsel") and submit the following proposed procedural schedule to address the Company's purchased gas adjustment factors to be Audited in its 1999-2000 and 2000-2001 Actual Cost Adjustment and a Motion to Consolidate. In support thereof, the parties state as follows:

1. Case No. GR-2000-520 deals with the matter of Missouri Public Service's Purchased Gas Adjustment factors to be reviewed in its 1999-2000 Actual Cost Adjustment.

2. Case No. GR-2001-461 deals with the matter of Missouri Public Service's Purchased Gas Adjustment factors to be reviewed in its 2000-2001 Actual Cost Adjustment.

3. There is not currently a comprehensive procedural schedule pending in GR-2000-520 and GR-2001-461.

4. Commission Rule 4 C.S.R. 240-2.110(3) provides:

When pending actions involve related questions of law or fact, the commission may order a joint hearing of any or all matters at issue, and may make other orders concerning cases before it to avoid unnecessary costs or delay.

5. Case Nos. GR-2000-520 and GR-2001-461 involve common questions of law and fact in that both cases involve Missouri Public Services' Purchased Gas Adjustment Factors to be Audited in Actual Cost Adjustments. Case No. GR-2000-520 involves the Company's Purchased Gas Adjustment Factors to be Audited in its 1999-2000 Actual Cost Adjustment. Case No. GR-2001-461 involves the Company's Purchased Gas Adjustment Factors to be Audited in its 2000-2001 Actual Cost Adjustment.

6. The undersigned parties submit that a consolidation of GR-2000-520 and GR-2001-461 into one case with a joint proposed procedural schedule would be beneficial and would dispose of any contested issues raised in both GR-2000-520 and GR-2001-461.

The undersigned parties propose that these two cases should be consolidated and that the following procedural schedule be established:

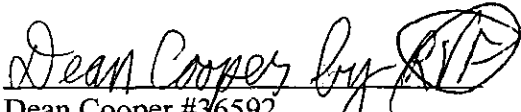
November 1, 2001	Company makes its 2000-2001 books and workpapers available to Staff for audit (GR-2001-461)
November 20, 2001	Company answers Staff's standard DRs (49 in number for GR-2001-461)
May 15, 2002	Staff Recommendations (Both cases-May be filed together or separately)
June 12, 2002	Company response to Staff Recommendation (Both cases)

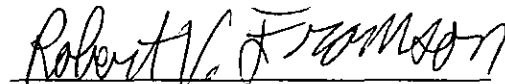
July 12, 2002	Direct Testimony (All parties wishing to file)
August 13, 2002	Rebuttal Testimony (All parties wishing to file)
August 20, 2002	Issues List to be filed.
August 27, 2002	Position Statements (All Parties)
September 10, 2002	Surrebuttal testimony
September 16, 2002	Hearing

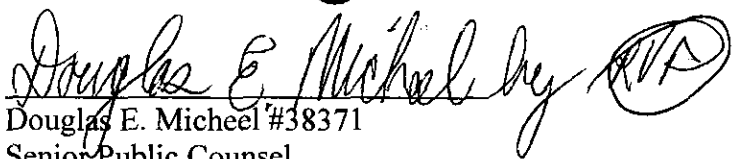
7. This schedule will dispose of any contested issues raised in GR-2000-520 and GR-2001-461.

WHEREFORE, the undersigned parties respectfully request that the Commission issue an order consolidating these two cases and adopting the proposed procedural schedule set forth herein.

Respectfully submitted,

  
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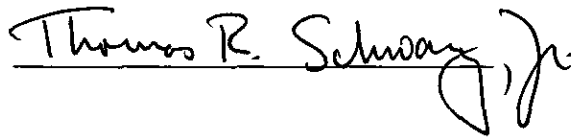
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**Certificate of Service**

I hereby certify that the foregoing Proposed Procedural Schedule has been duly served upon all parties of record to this proceeding, on this 3<sup>rd</sup> day of May 2001.

Thomas R. Schwarz, Jr.

Service List for  
Case No. GR-2000-520/GR-2001-461  
Revised: May 3, 2001 (ccl)

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