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January 7, 2002

FILED²

JAN 07 2002

Missouri Public
Service Commission

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

RE: UtiliCorp United Inc. d/b/a Missouri Public Service - Case No. GA-2002-285

Dear Mr. Roberts:

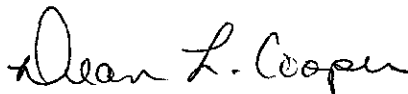
Enclosed for filing in the above-referenced proceeding please find an original and eight copies of a Response to Staff Memorandum and Recommendation. Please stamp the enclosed extra copy "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me.
Thank you for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



Dean L. Cooper

DLC/rhg

Enclosures

cc: Mr. David Meyer, PSC
Mr. Doug Micheel, OPC

FILED²

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

JAN 07 2002

In the Matter of the Application of UtiliCorp)
United Inc., d/b/a Missouri Public Service)
and St. Joseph Light & Power Company for)
an accounting authority order relating to)
Commission Rule 4 CSR 240-13.055(13).)

Missouri Public
Service Commission

Case No. GA-2002-285

RESPONSE TO STAFF MEMORANDUM AND RECOMMENDATION

COMES NOW UtiliCorp United Inc. ("UtiliCorp"), d/b/a Missouri Public Service ("MPS") and St. Joseph Light & Power Company ("SJLP"), and hereby respectfully provides to the Missouri Public Service Commission ("Commission") the following response to the Staff Memorandum and Recommendation:

1. On December 14, 2001, UtiliCorp filed its Application for Accounting Authority Order Requested to be Issued Prior to January 11, 2002 and Motion for Expedited Treatment (the "Application"). On January 3, 2002, the Commission Staff ("Staff") filed its Memorandum and Recommendation concerning the Application. The Commission then issued its Notice Setting Time for Response on January 4, 2002, directing that responses to the Staff Memorandum and Recommendation be filed no later than January 8, 2002.

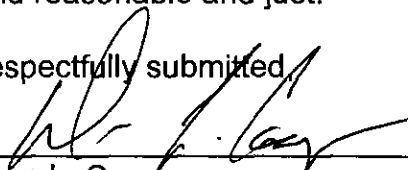
2. UtiliCorp has reviewed the Staff Memorandum and Recommendation and UtiliCorp's counsel has additionally discussed this matter with counsel for the Staff. Based upon this discussion, it is UtiliCorp's understanding that the "matrix" attached to the Memorandum is merely provided as an indication of Staff's "intent" as to how it will review future requests for recovery of amounts deferred pursuant to any Accounting Authority Order ("AAO") which may be granted in this case. It is also UtiliCorp's understanding, based upon this discussion, that nothing contained in Staff's Memorandum and

Recommendation would prohibit UtiliCorp from proposing and seeking to have the Commission adopt as a more accurate assessment of the costs of the Emergency Rule a different method for calculation of such costs in any future case where recovery of these amounts may be sought.

3. With these understandings, UtiliCorp has no objection to the Staff's Memorandum and Recommendation.

WHEREFORE, UtiliCorp respectfully requests the Commission issue its Accounting Authority Order, consistent with the Application and the response herein, and issue such further orders as the Commission should find reasonable and just.

Respectfully submitted,


Dean L. Cooper MBE#36592
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ATTORNEYS FOR UTILICORP UNITED INC.
D/B/A MISSOURI PUBLIC SERVICE AND
ST. JOSEPH LIGHT & POWER COMPANY

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was hand-delivered, on this 7th day of January, 2002, to:

Mr. David Meyer
Missouri Public Service Commission
Governor State Office Building
P.O. Box 360
Jefferson City, MO 65102-0360

Mr. Doug Micheel
The Office of the Public Counsel
6th Floor, Governor State Office Building
P.O. Box 7800
Jefferson City, MO 65102-7800

