



Missouri Public Service Commission

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October 23, 2000

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

FILED³

OCT 23 2000

Missouri Public
Service Commission

RE: Case No. EO-2000-845

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **PROPOSED LIST OF ISSUES, ORDER OF WITNESSES AND ORDER OF CROSS-EXAMINATION.**

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,

Nathan Williams
Assistant General Counsel
(573) 751-8702
(573) 751-9285 (Fax)

NW/lb
Enclosure
cc: Counsel of Record

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

FILED³
OCT 23 2000
Missouri Public
Service Commission

In the matter of the Application of St. Joseph)
Light & Power Company for the Issuance of)
an Accounting Authority Order Relating to its)
Electrical Operations.)

Case No. EO-2000-845

**PROPOSED LIST OF ISSUES, ORDER OF WITNESSES
AND ORDER OF CROSS-EXAMINATION**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), on behalf of Staff, St. Joseph Light & Power Company (SJLP), the Office of the Public Counsel (OPC) and Ag Processing (AP), and submits the following Proposed List of Issues, Order of Witnesses and Order of Cross-Examination, for the evidentiary hearing to be held in this case October 26-27, 2000.

On June 23, 2000, SJLP filed an Application for Accounting Authority Order.

On September 14, 2000, the Missouri Public Service Commission ("Commission") issued an Order Adopting Procedural Schedule, in which it directed the parties to agree upon a list of the issues to be heard, the witnesses to appear on each day of the hearing, the order in which the witnesses will be called, and the order of cross-examination of each witness.

The above parties have conferred and have identified the following list of contested issues. Additionally, all of the parties, including SJLP, have agreed upon the following order of witnesses and order of cross-examination.

I. LIST OF CONTESTED ISSUES

1. Should the Commission grant to SJLP an Accounting Authority Order to defer recognition of the costs it incurred as the result of the incident at Unit 4/6 at SJLP's

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Lake Road Power Plant on June 7, 2000?

2. Was the cause of the costs SJLP seeks to defer in this case due to SJLP operator error?
3. If the answer to (2) is "yes," was the SJLP operator error that caused the costs SJLP seeks to defer in this case the result of circumstances created by SJLP?
4. If the answer to (3) is "yes," should the Commission grant to SJLP an Accounting Authority Order to defer recognition of the costs it incurred as the result of the incident at Unit 4/6 at SJLP's Lake Road Power Plant on June 7, 2000?
5. Was the cause of the incident at Unit 4/6 at the Lake Road Power Plant on June 7, 2000, the result of SJLP's acts and/or omissions?
6. Was the event involving Unit 4/6 at the Lake Road Power Plant on June 7, 2000, an "extraordinary event" as that term has been used by the Commission in the approval of past Accounting Authority Orders?
7. Was the event involving Unit 4/6 at the Lake Road Power Plant on June 7, 2000, a "nonrecurring event" as that term has been used by the Commission in the approval of past Accounting Authority Orders?
8. Do the costs identified by SJLP resulting from the June 7, 2000 event qualify as "material" under the definition of that word in the Uniform System of Accounts?
9. Should the Commission adopt the new criteria for the issuance of an AAO advocated by Staff in the prepared rebuttal testimony of Mr. Harris?
10. Should the Commission authorize the deferral of \$3,332,931 as requested by SJLP, or some other amount?
11. Should the Commission address the issue of prudence in this case?
12. If the Commission allows SJLP to defer costs pursuant to an AAO, when should the Commission require the amortization to begin?
13. If the Commission allows SJLP to defer costs pursuant to an AAO, when should SJLP be required to file a rate case to recover the deferred costs?

II. ORDER OF WITNESSES

Set forth below is the anticipated order of appearance of witnesses, along with an estimate as to the day each will be testifying. The parties desire to expedite the hearing and

therefore, with the exception of the Office of the Public Counsel's expert witness Jatinder Kumar who is not available until Friday, October 27, 2000, the parties agree to make each of the witnesses available to testify immediately following the conclusion of the testimony by the preceding witness.

Thursday, October 26, 2000

1. SJLP witnesses:

Larry J. Stoll
Stephen L. Ferry
Dwight V. Svuba
Timothy M. Rush

2. OPC witnesses:

Russell W. Trippensee

3. Staff witnesses:

V. William Harris
David P. Broadwater
Tom Y. Lin

Friday, October 27, 2000

4. OPC's witness:

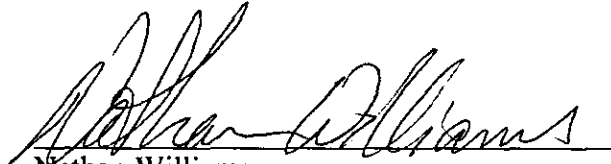
Jatinder Kumar

III. ORDER OF CROSS EXAMINATION

1. SJLP witnesses: AP, Staff, OPC
2. OPC witnesses: AP, Staff, SJLP
3. Staff witnesses: AP, OPC, SJLP

Respectfully submitted,

DANA K. JOYCE
General Counsel




Nathan Williams
Assistant General Counsel
Missouri Bar No. 35512

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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 23rd day of October, 2000.



Service List for
Case No. EO-2000-845
Revised: October 23, 2000 (lb)

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