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State of Missouri

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**Office of the Public Counsel** 

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September 25, 2000

FILED<sup>2</sup>

SEP 2 5 2000

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

Missouri Public Service Commission

RE: UtiliCorp United Inc. and St. Joseph Light & Power Company Case No. EM-2000-292

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case please find the original and eight copies of **Request** for an Extension of Reply Briefs and Request for Expedited Treatment. Please "file" stamp the extra-enclosed copy and return it to this office.

Thank you for your attention to this matter.

Sincerely,

John B. Coffman

Deputy Public Counsel

JBC:jb

cc: Counsel of Record

## BEFORE THE PUBLIC SERVICE COMMISSION FILED<sup>2</sup> OF THE STATE OF MISSOURI

SEP 2 5 2000

Missouri Public Service Commission

In The Matter Of The Joint Application Of ) UtiliCorp United Inc. And St. Joseph Light ) & Power Company For Authority To Merge ) St. Joseph Light & Power Company With ) And Into UtiliCorp United Inc. And, In ) Connection Therewith Certain Other ) Related Transaction. )

Case No. EM-2000-292

## Request for an Extension of Reply Briefs and Request for Expedited Treatment

Comes Now the Missouri Office of the Public Counsel (Public Counsel), and for its Request for an Extension of Reply Briefs and Request For Expedited Treatment, states as follows:

- Based upon an August 23, 2000 Order of the Missouri Public Service Commission (Commission), the reply briefs in this case are due on Friday, September 29, 2000.
- 2) Due to the press of other business and a desire to sufficiently respond to arguments raised in the initial briefs filed in this case by the other parties, Public Counsel hereby requests a short extension of the deadline for all parties to file their reply briefs. Public Counsel requests a four-day extension, from Friday, September 29, 2000 to Monday, October 3, 2000. Public Counsel believes that

this extension would be reasonable and would create no undue hardship for the Joint Applicants.

- 3) Public Counsel has contacted all of the other parties to this case (UtiliCorp United, St. Joseph Light and Power Company, the Staff of the Commission, City Utilities of Springfield, Missouri Attorney General, AG Processing, Inc., and AmerenUE) regarding this request for an extension. None of these parties object to the request for an extension until October 3 for filing of the reply briefs.
- 4) Pubic Counsel also requests expedited treatment of this request so that the parties will have sufficient notice regarding what additional time remains to complete briefing in this case.

WHEREFORE, Public Counsel respectfully requests that the Commission extend

the deadline for filing Reply Briefs in this case from September 29, 2000 to October 3, 2000.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By:

John B. Coffman (#36591) Deputy Public Counsel P. O. Box 7800 Jefferson City, MO 65102 (573) 751-5560 (573) 751-5562 FAX

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 25th day of September, 2000:

James Swearengen Brydon, Swearengen & England P.O. Box 456 Jefferson City, MO 65102

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