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June 29, 1999

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

**FILED**

JUN 29 1999

Missouri Public  
Service Commission

**RE: Empire District Electric Company**  
**Case Nos. EX-99-442**

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case please find the original and fourteen copies of **Request to Change Effective Date**. I have on this date mailed or hand-delivered copies to all counsel of record. 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:mk

cc: Counsel of Record

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

In The Matter Of 4 CSR 240-20.015 )  
Proposed Rule – Electric Utilities )  
Affiliate Transactions. )

Case No. EX-99-442

**FILED**  
JUN 29 1999  
Missouri Public  
Service Commission

**Request To Change Effective Date**

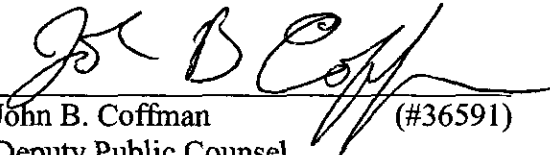
Comes now the Office of the Public Counsel (Public Counsel) and for its Request to Change Effective Date states as follows:

1. On June 14, 1999 Empire District Electric Company (Company) requested a protective order in this case. On June 23, 1999, Public Counsel also requested a protective order in this case.
2. On June 25, 1999 the Commission issued its Order Adopting Protective Order adopting a standard protective order and bearing an effective date of July 6, 1999.
3. The effective date of the protective order creates a problem because initial comments in this case are due on July 1, 1999, and Public Counsel plans to file initial comments on that date referring to highly confidential information. Public Counsel believes that the effective date can be changed to July 1, 1999 without impairing due process, because the Commission's Order Adopting Protective Order was a procedural order of an interlocutory nature.
4. The attorney for Company has no objection to this request.

WHEREFORE, Public Counsel respectfully requests that the Commission change the effective date of its Order Adopting Protective Order to July 1, 1999.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By:  (#36591)

John B. Coffman  
Deputy Public Counsel

Douglas E. Micheel (#38371)  
Senior Public Counsel

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**CERTIFICATE OF SERVICE**

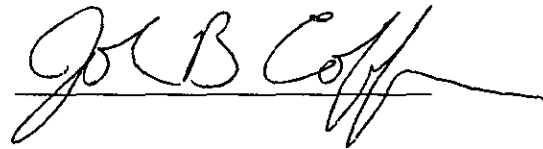
I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 29th day of June, 1999:

Dan Joyce  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Gary Duffy  
Brydon, Swearingen & England  
P.O. Box 456  
Jefferson City, MO 65102

Bill Riggins  
Kansas City Power & Light  
P.O. Box 418679  
Kansas City, MO 64141-9679

General Counsel  
AmerenUE  
P.O. Box 66149  
St. Louis, MO 63166

A handwritten signature in cursive script, appearing to read "J B Coffey", is written over a horizontal line.