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November 10, 1999

GORDON L. PERSINGER
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Director, Research and Public Affairs

WESS A. HENDERSON
Director, Utility Operations

ROBERT SCHALLENBERG
Director, Utility Services

DONNA M. KOLILIS
Director, Administration

DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

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

RE: Case No. EF-2000-270

FILED²

NOV 10 1999

Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a **RESPONSE OF STAFF TO ORDER DIRECTING RESPONSE**.

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) 751-7434
(573) 751-9285 (Fax)

NW/df
Enclosure
cc: Counsel of Record

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

FILED²

NOV 10 1999

Missouri Public
Service Commission

In the Matter of the Application of)
UtiliCorp United Inc. for Authority to)
Increase its Ownership Interest in Horizon)
Energy Distribution Limited, a New)
Zealand Electric Distribution Utility, by)
Acquiring Indirectly 47.7 Percent of the)
Capital Stock Thereof, and to Take All)
Other Actions Reasonably Necessary to)
Effectuate Said Transaction.)

Case No. EF-2000-270

RESPONSE OF STAFF TO ORDER DIRECTING RESPONSE

COMES NOW the Staff of the Missouri Public Service Commission and for its Response to the Commission's Order Directing Response issued October 28, 1999, respectfully states:

1. On October 12, 1999, UtiliCorp United Inc. ("UtiliCorp"), a Delaware Corporation conducting business in Missouri subject to the jurisdiction of the Missouri Public Service Commission, pursuant to § 393.190, RSMo. 1994 and 4 CSR 240-2.060(9), filed its Application seeking authorization from the Commission for it to acquire the remaining capital stock of Horizon Energy Distribution Limited ("Horizon") f/k/a Bay of Plenty Electricity Limited.

2. UtiliCorp requested the Commission approve its application by December 15, 1999.

3. In its application UtiliCorp states that it presently owns 78.8% of UnitedNetworks Limited ("UnitedNetworks") f/k/a Power New Zealand Limited and that UnitedNetworks owns approximately 52.3% of the voting securities of Horizon; however, those voting rights are limited by a shareholders' agreement.

4. In its application UtiliCorp indicates that it anticipates the direct acquisition of the remaining capital stock of Horizon will be made by UnitedNetworks or its nominee.

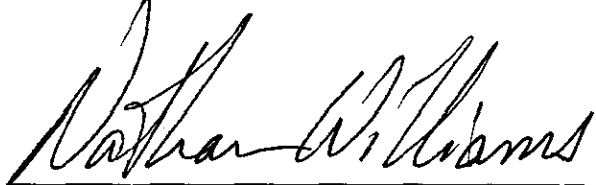
5. On October 28, 1999, the Commission issued its Order effective October 28, 1999, directing the Staff of the Missouri Public Service Commission ("Staff") and any other interested party to respond to UtiliCorp's request for expedited treatment no later than November 10, 1999 and for the Staff "to advise the Commission of the earliest date it could file a recommendation regarding the application."

6. The Staff requires additional information from the applicant regarding the proposed transaction in order to prepare its recommendation to the Commission regarding the application. Because the acquisition of the needed additional information is dependent upon the applicant, the Staff cannot determine the earliest date it can make its recommendation to the Commission regarding the application; however, if it receives the information it requires in a timely fashion, the Staff anticipates it will be in a position to file its recommendation to the Commission regarding the application no later than Friday, December 3, 1999.

WHEREFORE, the Staff does not oppose the request of UtiliCorp United Inc. for expedited treatment of the application filed in this case.

Respectfully submitted,

DANA K. JOYCE
General Counsel

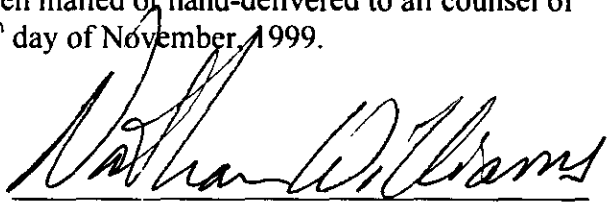
A handwritten signature in cursive script, appearing to read "Nathan Williams", written over a horizontal line.

Nathan Williams
Assistant General Counsel
Missouri Bar No. 35512

Attorney for the Staff of the
Missouri Public Service Commission
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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 10th day of November, 1999.

A handwritten signature in cursive script, appearing to read "Nathan Williams", written over a horizontal line.