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November 2, 2001

FILED²
NOV 0 2 2001

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

RE: Case No. GR-99-435

Dear Mr. Roberts:

DAVID V.G. BRYDON

PAUL A, BOUDREAU

SONDRA B. MORGAN

CHARLES E. SMARR

GARY W. DUFFY

JAMES C. SWEARENGEN

WILLIAM R. ENGLAND, III

JOHNNY K. RICHARDSON

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of a Response to Staff Recommendation. This document contains information that has been deemed to be HIGHLY CONFIDENTIAL under the terms of the Protective Order in place in this proceeding. Also enclosed please find one original of the NON-PROPRIETARY version of the Response to Staff 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 very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

Bean L. Cooper

DLC/rhg Enclosures

cc:

Mr. Robert Franson, General Counsel

Mr. Doug Micheel, OPC

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of Missouri Public Service's Purchased Gas Adjustment factors to be Reviewed in its 1998-1999 Actual Cost Adjustment.	;)))	Case No. GR-99-435	NOV 0 2 2001 Service Commission
-	DECRO	NOT	Commission

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RESPONSE TO STAFF RECOMMENDATION

Comes now UtiliCorp United Inc. d/b/a Missouri Public Service ("MPS") and, for its Response to Staff Recommendation, states the following to the Missouri Public Service Commission ("Commission"):

- On October 1, 2001, the Commission Staff ("Staff") filed its Staff
 Recommendation. This pleading incorporated a Memorandum containing its recommendation in this matter.
- 2. On October 3, 2001, the Commission issued its Order Directing Response wherein it directed MPS to file a response to the Staff Recommendation no later than November 2, 2001.
 - 3. MPS responds in the following paragraphs to the Staff Recommendation.

IMBALANCES

4. Staff describes in its Recommendation its proposal for pricing pipeline imbalances for MPS's three districts. Based upon this methodology, MPS agrees with the Staff's Recommendation as to Imbalances.

PUT/CALL TRANSACTIONS

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RELIABILITY ANALYSIS

9. As stated in the Staff Recommendation, Staff previously accepted MPS's proposal regarding reliability issues for the three systems. MPS has made the requisite filing in Commission Case No. GR-2000-520.

WHEREFORE, MPS prays that the Commission issue such orders as it shall deem just and reasonable under the circumstances.

Respectfully submitted,

Dean L. Cooper

M**J**E #36592

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ATTORNEYS FOR UTILICORP UNITED INC. D/B/A MISSOURI PUBLIC SERVICE

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was either hand-delivered or mailed, U.S. Mail, postage prepaid, on the 2nd day of November, 2001, to: Robert Franson, Public Service Commission, Governor Office Building, Jefferson City, Mo 65101; and, Douglas Micheel, Office of the Public Counsell 6th Floor, Governor Office Building, Jefferson City, Mo 65101.

APPENDIX A HAS BEEN DEEMED TO BE

HIGHLY

CONFIDENTIAL