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December 14, 2001

FILED
DEC 14 2001
Missouri Public
Service Commission

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

RE: UtiliCorp United Inc. d/b/a Missouri Public Service - Case No. GIA-2002-215

Dear Mr. Roberts:

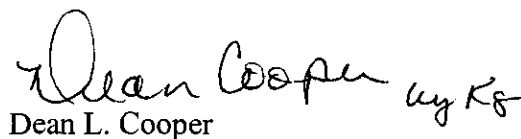
Enclosed please find an original and eight copies of an Application for Accounting Authority Order Requested to be Issued Prior to January 11, 2002, and Motion for Expedited Treatment. Please stamp the enclosed extra copy "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:


Dean L. Cooper

DLC/rhg

Enclosures

cc: Office of the Public Counsel
Office of the General Counsel

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

FILED²
DEC 14 2001

Missouri Public
Service Commission

In the Matter of the Application of UtiliCorp)
United Inc., d/b/a Missouri Public Service)
and St. Joseph Light & Power Company for)
an accounting authority order relating to)
Commission Rule 4 CSR 240-13.055(13).)

Case No. GA-2002-295

**APPLICATION FOR ACCOUNTING AUTHORITY ORDER
REQUESTED TO BE ISSUED PRIOR TO JANUARY 11, 2002
AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW UtiliCorp United Inc. ("UtiliCorp"), d/b/a Missouri Public Service ("MPS") and St. Joseph Light & Power Company ("SJLP"), pursuant to 4 CSR 240-13.055(13), Section 393.140 RSMo. 2000, 4 CSR 240-50.030 and 4 CSR 240-2.080(17), and hereby respectfully requests that the Missouri Public Service Commission ("Commission") issue an Accounting Authority Order ("AAO") which includes the specific requests set forth below. In support of its Application, UtiliCorp states as follows to the Commission:

PARTIES

1. UtiliCorp's principal place of business is located at 20 W. Ninth Street, Kansas City, MO 64138. UtiliCorp is duly incorporated under the laws of the State of Delaware. UtiliCorp is authorized to conduct business in Missouri through its MPS and SJLP operating divisions. A certified copy of UtiliCorp's Certificate of Corporate Good Standing-Foreign fictitious name registration as issued by the Secretary of State of the State of Missouri were previously filed with the Commission in Case No. EM-2000-292 and are hereby incorporated by reference in accordance with 4 CSR 240-2.060(1)(G). A copy of SJLP's fictitious name registration as issued by the Missouri Secretary of State was

previously filed with the Commission in Case No. GR-2001-497, and the same is incorporated herein by reference.

2. UtiliCorp is engaged in providing electrical, natural gas and heating company utility service in Missouri to customers in its service areas, including approximately 200,000 electric and 50,000 gas customers. UtiliCorp is an "electrical corporation," a "gas corporation," a "heating company" and a "public utility" as those terms are defined in Section 386.020 RSMo 2000. UtiliCorp is unaware of any pending action or final unsatisfied judgments or decision against UtiliCorp from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within the three (3) years prior to the date of this filing. No annual report or assessment fees pertaining to UtiliCorp are overdue.

3. Pleadings, notices, orders and other correspondence concerning this Application should be addressed to:

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312 E. Capitol Avenue
P. O. Box 456
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Steve Jurek
UtiliCorp United Inc.
1815 Capitol Avenue
Omaha, NE 68102
402/221-2262
FAX: 402/221-2501
e-mail: sjurek@utilicorp.com

FACTS

4. The Commission recently promulgated emergency rule 4 CSR 240-13.055(13). The Commission stated that this emergency rule:

modifies the existing provisions of [the cold weather rule] to: provide more lenient terms for reconnection of gas utility service to disconnected residential customers, prohibit assessing or billing of deposits, prohibit the assessment of late payment charges on deferred amounts, prohibit interest

charges on account balances for the deferral period, require application of existing deposits and accrued interest to avoid discontinuance of service, and to allow the gas utilities to collect expenses associated with this emergency amendment.

Missouri Register, p. 2259 (December 3, 2001).

ACCOUNTING AUTHORITY ORDER

5. Subsection 4 CSR 240-13.055(13)(F) states that "The Commission shall grant an Accounting Authority Order, . . . upon application of a gas utility, and the gas utility may book to Account 186 for review, audit and recovery all incremental expenses incurred and incremental revenues that are caused by this emergency amendment. Any such Accounting Authority Order shall be effective until September 30, 2003."

6. 4 CSR 240-13.055(13) applies to UtiliCorp and UtiliCorp has taken steps to comply with this emergency rule since it became effective.

7. Therefore, UtiliCorp hereby requests the Commission issue its AAO prior to January 11, 2002, which includes the following language:

a) That UtiliCorp is authorized to maintain on its books a regulatory asset which represents all incremental expenses incurred and incremental revenues that are caused by 4 CSR 240-13.055(13) between the effective date of 4 CSR 240-13.055(13) and September 30, 2003. Such regulatory asset may remain on UtiliCorp's books until the effective date of a Report and Order in UtiliCorp's next general rate proceeding; and,

b) That the Commission intends that rates established in UtiliCorp's next general rate case will include, among other things, treatment of the amounts deferred by UtiliCorp in accordance with 4 CSR 240-13.055(13) and this

AAO, and, if amortized, an amortization of such amounts deferred pursuant to this AAO, over a period of time ending no later than three years after rates become effective in UtiliCorp's next rate case.

MOTION TO EXPEDITE

8. UtiliCorp requests that the Commission expedite its treatment of the above Application, as necessary, so that it may be addressed prior to January 11, 2002.

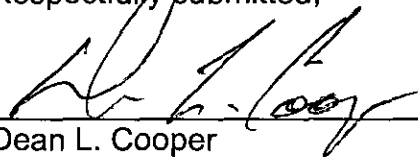
9. UtiliCorp has taken steps to comply with 4 CSR 240-13.055(13) since its effective date and has, therefore, incurred expenses associated with the emergency rule. The Commission as deemed the rule, to include the AAO authorized therein, to be in the public interest. In order for UtiliCorp to reflect its expenses as a regulatory asset on its 2001 books as intended by 4 CSR 240-13.055(13) and to fulfill the intent of the Commission, UtiliCorp needs a decision prior that time when its 2001 books will be closed, or on or about January 11, 2002.

10. This motion is being filed as soon as it reasonably could have been.

WHEREFORE, UtiliCorp respectfully requests the Commission, on an expedited basis, to the extent necessary to reach a decision prior to January 11, 2002, issue its Accounting Authority Order, consistent with the request made herein, and for such further

orders as the Commission should find reasonable and just.

Respectfully submitted,



Dean L. Cooper MBE#36592
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ATTORNEYS FOR UTILICORP UNITED INC.
D/B/A MISSOURI PUBLIC SERVICE AND
ST. JOSEPH LIGHT & POWER COMPANY

STATE OF NEBRASKA)

COUNTY OF DOUGLAS)

ss

I, Steven M. Jurek, state that I am Vice President, Regulatory Services of UtiliCorp United Inc. d/b/a Missouri Public Service and St. Joseph Light & Power; that I have read the above and foregoing document; that the statements contained therein are true and correct to the best of my information, knowledge and belief; and, that I am authorized to make this statement on behalf of UtiliCorp.

Steven M. Jurek

Subscribed and sworn to before me this 14th day of December, 2001.

Richard G. Petersen
Notary Public

My Commission Expires: 7/4/05

(SEAL)

