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## Missouri Public Service Commission

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September 6, 2000

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Executive Director

GORDON L. PERSINGER  
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WESS A. HENDERSON  
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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

**FILED<sup>2</sup>**  
SEP 6 2000

Missouri Public  
Service Commission

**RE: Case No. EM-2000-292**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the HC version of the **INITIAL BRIEF OF STAFF** and original and one (1) copy of the NP version. Also enclosed for filing are an original and eight (8) conformed copies of Staff's Motion for Leave to Late File Staff's Initial Brief.

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,

A handwritten signature in cursive script, appearing to read "Steve Dottheim".

Steve Dottheim  
Chief Deputy General Counsel  
(573) 751-7489  
(573) 751-9285 (Fax)

SD/lb  
Enclosure  
cc: Counsel of Record

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

**FILED<sup>2</sup>**

SEP 6 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 transactions. )

Case No. EM-2000-292

**STAFF'S MOTION FOR LEAVE  
TO LATE FILE STAFF'S INITIAL BRIEF**

**COMES NOW** the Missouri Public Service Commission Staff (Staff) and files the instant motion requesting that the Missouri Public Service Commission (Commission) grant the Staff leave to late file Staff's Initial Brief in this case. In support of its motion the Staff states as follows:

1. Under the original procedural schedule set by the Commission, Initial Briefs were due August 28, 2000.
2. On August 23, 2000, in response to the Staff's motion for an extension of time to file Initial Briefs and Reply Briefs based on disruption that resulted from the move of the Commission's office, the Commission extended the filing date of the Initial Briefs to September 5, 2000 and the Reply Briefs to September 29, 2000, for all parties.
3. Despite the Staff's attempt to meet the extended filing deadline, due to the press of other Commission matters as well as unplanned for difficulties in assembling into a single document numerous sections drafted by different authors using different formatting, the Staff did not meet the filing deadline. Resolving the formatting problems consumed much of the day and into the evening of September 5, 2000. The Staff has not reviewed any other party's Initial Brief


for the purpose of preparing its own Initial Brief. The Staff submitted for filing after 4:00 p.m. on September 5, 2000, the Staff's notice to the Commission and other parties that the Staff had not timely filed the Staff's Initial Brief. The Staff's Initial Brief is submitted for filing contemporaneously with this motion for leave to late file the Staff's Initial Brief.

4. The delay in Staff's submission to the Commission for filing of its Initial Brief was not done for the purpose of delay or to cause prejudice to any party. The undersigned Staff counsel again apologizes for the inconvenience to the Commissioners, Regulatory Law Judge, and parties to this proceeding.

**WHEREFORE**, the Staff requests that the Commission grant the Staff leave to late file its Initial Brief.

Respectfully submitted,

DANA K. JOYCE  
General Counsel



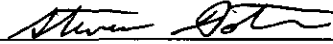
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Steven Dottheim  
Chief Deputy General Counsel  
Missouri Bar No. 29149

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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 6<sup>th</sup> day of September, 2000.

\_\_\_\_\_

**Service List for  
Case No. EM-2000-292  
September 6 2000**

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