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December 30, 1999

VIA HAND DELIVERY

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission Truman State Office Building, Room 530 PO Box 360 Jefferson City Missouri 65102 FILED²
DEC 3 0 1999

Missouri Public Service Commission

Re: Case No. EC-99-553

Dear Judge Roberts:

Enclosed for filing in the above case is an original and fourteen copies of GST Steel Company's Response to Order Directing Filing Regarding Counsel's Signature on GST Steel Company's Reply to the Response of Kansas City Power & Light to GST's Motion Seeking Clarification and Reconsideration of Order Regarding Kansas City Power & Light's Second Motion to Compel.

Thank you in advance for your attention to this matter.

Sincerely,

LATHROP & GAGE L.C.

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Kurt U. Schaefer

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cc:

To all parties of record

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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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GST Steel Company,	DEC 3 0 1999
Complainant,) Missouri Public Service Commission
v.) Case No. EC-99-553
Kansas City Power & Light Company,	
Respondent.))

RESPONSE TO ORDER DIRECTING FILING REGARDING
COUNSEL'S SIGNATURE ON GST STEEL COMPANY'S
REPLY TO THE RESPONSE OF KANSAS CITY POWER & LIGHT TO GST'S MOTION
SEEKING CLARIFICATION AND RECONSIDERATION OF ORDER REGARDING
KANSAS CITY POWER & LIGHT'S SECOND MOTION TO COMPEL

- On December 22, 1999, GST Steel Company filed its Reply to the Response of Kansas City Power & Light to GST'S Motion Seeking Clarification and Reconsideration of Order Regarding Kansas City Power & Light's Second Motion to Compel ("Reply").
- 2. On December 28, 1999, this Commission entered an Order Directing Filing, which states that counsel's signature on the Reply is illegible and which orders counsel for GST to file a pleading, on or before 3:00 p.m., Thursday, December 30, 1999, identifying by name the specific individual that signed the Reply.
- 3. The signature on the Reply, as well as the signature of counsel on this pleading and accompanying certificate of service, is the signature of attorney Kurt U. Schaefer. See attached affidavit of David A. Shorr, attached hereto and fully incorporated herein.

WHEREFORE, counsel for GST Steel Company states that the signature of counsel on the Reply is the signature of attorney Kurt U. Schaefer.

Respectfully submitted,

Paul S. DeFord

Mo. #29509

Kurt U. Schaefer

Mo. #45829 Peter J.P. Brickfield

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Attorneys for GST Steel Company

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, postage prepaid, to all counsel of record as shown on the following service list this 30th day of December, 1999.

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Attorney for GST, Kurt U. Schaefer

STATE OF MISSOURI)	
) ss	
COUNTY OF COLE)	

AFFIDAVIT OF ATTORNEY DAVID A. SHORR

I, David A. Shorr, being duly sworn, do attest and verify that the following is true and correct to the best of my knowledge and belief:

- 1. I am an attorney and partner with the Law Firm of Lathrop & Gage.
- 2. I am in charge of my firm's Jefferson City Office.
- 3. Attorney Kurt U. Schaefer is an associate in the Jefferson City office.
- 4. Mr. Schaefer has signed numerous legal pleading for me which have been filed in various courts throughout the State of Missouri, as well as pleadings for Mr. Paul DeFord, a partner in our firm's Kansas City office.
- 5. As a result of seeing Mr. Schaefer's signature on numerous pleadings, letters, and other documents, I recognize, confirm, and affirm, that the signature on GST Steel Company's Reply to the Response of Kansas City Power & Light to GST'S Motion Seeking Clarification and Reconsideration of Order Regarding Kansas City Power & Light's Second Motion to Compel, filed with the Public Service Commission on December 22, 1999, in Case No. EC-99-553, is the legal, normal, and typical signature of Mr. Schaefer that has been repeatedly accepted by various courts within this State, including the Missouri Supreme Court.

Further affiant sayeth naught.

David A. Shorr

Subscribed and sworn to before me this 30th day of December, 1999.

Judith E. Farley, Notary Public Callaway County, Missouri

My Commission expires: 3-3-2001