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August 23, 2000

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FILED³
23rd PB
AUG 23 2000

Missouri Public
Service Commission

RE: Case No. EM-2000-292 – 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.

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **STAFF MOTION FOR EXTENSION OF TIME TO FILE INITIAL AND REPLY BRIEFS.**

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,

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

Enclosure
cc: Counsel of Record

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
AUG 23 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 MOTION FOR EXTENSION OF TIME TO FILE INITIAL AND REPLY BRIEFS

Comes now the Staff of the Missouri Public Service Commission (Staff) and files the instant motion requesting that the Missouri Public Service Commission (Commission) grant a one-week extension of time for the parties to the instant proceeding to file initial briefs and a one-week extension of time for the parties to the instant proceeding to file reply briefs. The Staff also requests that the Commission give this motion expedited consideration and apologizes for not providing the Commission with more time in advance of the impending August 28, 2000 filing date for initial briefs. The Staff did not want to make the instant request unless the move to the Governor Office Building materially affected the Staff's ability to meet in particular the August 28, 2000 date for initial briefs. In support of its Motion, the Staff states as follows:

1. The Staff has worked diligently toward making the August 28, 2000 filing date for its initial brief in this proceeding. Despite the Staff's efforts to plan, mindful of the disruption that the move to the Governor Office Building would cause, the move has materially affected the Staff's preparation of its initial brief. This move has occurred in the context of a considerable workload of cases pending before the Commission and other cases on judicial review in the Missouri courts, which also require the time and effort of the Staff. The Staff is requesting an additional week for the filing of its and other parties' initial briefs from Friday, August 28, 2000 to Tuesday, September 5, 2000. The Staff also is requesting an additional week

for the filing of its and other parties' reply briefs from Friday, September 22, 2000 to Friday, September 29, 2000. As is customarily the case, the Staff is requesting the additional time for the other parties to this proceeding in addition to the Staff.

2. Counsel for the Staff has contacted counsel for all of the other parties regarding this matter. Counsel for all of the other parties, including counsel for UtiliCorp and SJLP, have indicated no objection to the Staff's request. SJLP requested that the Staff include in its Motion the following statement drafted by SJLP:

"SJLP has no objection to the Staff's request for an extension of time to file the initial and reply briefs, but must report to the Commission that SJLP continues to lose employees in anticipation of the merger. A timely decision in this matter would serve to help maintain high quality customer service for SJLP's customers and the communities it serves."


The Staff had no objection to including SJLP's statement and is truly appreciative of SJLP having no objection to the Staff's request for additional time. The Staff does not want to make too much of this matter, but the Staff would note that SJLP and UtiliCorp controlled the timing of the filing of their merger application, and regardless of the merger, SJLP has the responsibility to maintain appropriate employee levels and quality of service. The Staff's inclusion of SJLP's statement herein is in no way an endorsement or acceptance by the Staff of degradation in the quality of service provided by SJLP. Such degradation would be addressed by the Staff.

4. The purpose of the Staff's Motion is not to delay either the SJLP - UtiliCorp merger case or the Empire District Electric Company - UtiliCorp merger case, nor does the Staff believe that the granting of the Staff's request will materially affect the timing respecting either of these merger cases. The Staff does not take lightly the filing of this pleading and apologizes for any inconvenience that it may cause.

Wherefore the Staff requests that the Commission grant a one week extension of time from August 28, 2000 to September 5, 2000 for the filing of initial briefs and a one week extension of time from September 22, 2000 to September 29, 2000 for the filing of reply briefs in the instant proceeding.

Respectfully submitted,

DANA K. JOYCE
General Counsel


Steven Dottheim
Chief Deputy General Counsel
Missouri Bar No. 29149

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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 23rd day of August 2000.



**Service List for
Case No. EM-2000-292
August 23, 2000**

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