



Commissioners

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May 2, 2000

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WESS A. HENDERSON
Director, Utility Operations

ROBERT SCHALLENBERG
Director, Utility Services

DONNA M. KOLILIS
Director, Administration

DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

FILED³

MAY 02 2000

Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: EM-2000-292

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **STAFF'S MOTION TO LATE FILE ACCOUNTING SCHEDULES**.

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,

Nathan Williams
Assistant General Counsel
(573) 751-8702
(573) 751-9285 (Fax)

NW/dkf
Enclosure
cc: Counsel of Record

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

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 ACCOUNTING SCHEDULES**

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 Accounting Schedules referenced in Staff's rebuttal testimony filed in this case. Said accounting schedules are submitted to the Commission contemporaneously with this motion. In support of its motions the Staff states as follows:

1. Under the original procedural schedule set by the Commission, Staff's rebuttal testimony and schedules were due April 20, 2000.
2. In response to Staff's motion for extension of time for the parties to file rebuttal, surrebuttal and cross-surrebuttal testimony and schedules, the Commission, on April 20, 2000, extended the time and date Staff's rebuttal testimony and supporting schedules were due to 3:00 p.m. on May 2, 2000.
3. Although the Staff diligently attempted to meet the 3:00 p.m. filing deadline, due to a breakdown in the equipment used by the Staff's copy service to prepare the requisite numbers of copies for service and filing, the Staff was unable to meet the 3:00 p.m., May 2, 2000, filing deadline.

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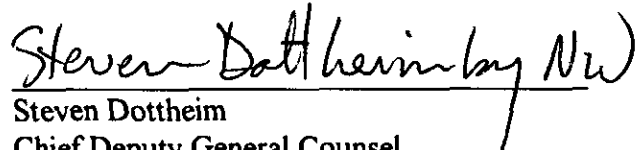
4. Staff is filing this motion before 4:00 p.m. on May 2, 2000 and contemporaneously submitting the Staff's Accounting Schedules for late filing.

5. The delay in Staff's submission to the Commission for filing of its Accounting Schedules was due to events beyond the control of Staff and was not done for the purpose of delay or to cause prejudice to any party; further, the short delay should cause prejudice to no party.

Wherefore the Staff requests that the Commission grant the Staff leave to late file its Accounting Schedules referenced in its timely filed rebuttal testimony and accept for filing the Staff Accounting Schedules submitted contemporaneously with this motion.

Respectfully submitted,

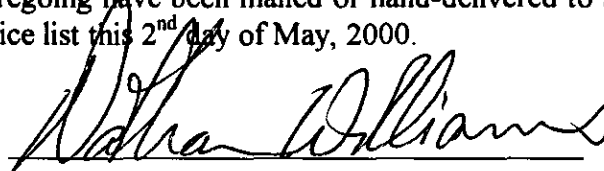
DANA K. JOYCE
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Steven Dottheim
Chief Deputy General Counsel
Missouri Bar No. 29149

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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 2nd day of May, 2000.



**Service List for
Case No. EM-2000-292
May 2, 2000**

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