

Missouri Public Service Commission

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M. DIANNE DRAINER Vice Chair POST OFFICE BOX 360 JEFFERSON CITY, MISSOURI 65102 573-751-3234 573-751-1847 (Fax Number) http://www.ecodev.state.mo.us/psc/

October 14, 1999

GORDON L. PERSINGER Acting Executive Director Director, Research and Public Affairs

> 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

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

FILED² OCT 1 4 1999

Service Commission

RE: Case No.EC-99-553 - Kansas City Power & Light Company

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of the STAFF'S RESPONSE TO THE COMMISSION'S ORDER DIRECTING FILING.

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.

Lera L. Shemwell Assistant General Counsel (573) 751-7431 (573) 751-9285 (Fax)

LLS/wf Enclosure cc: Counsel of Record

Informed Consumers, Quality Utility Services, and a Dedicated Organization for Missourians in the 21st Century

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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GST Steel Company,
Complainant,
v.
Kansas City Power & Light Company,
Respondent.

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FILED² OCT 1 4 1999 Service Commission

Case No. EC-99-553

STAFF'S RESPONSE TO THE COMMISSION'S ORDER DIRECTING FILING

COMES NOW the Staff of the Missouri Public Service Commission and in response to the Commission's October 6, 1999 Order to file a pleading stating whether or not the General Counsel's Office was served with a copy of Kansas City Power & Light Company's Motion to Compel GST Steel Company's Responses to the First Set of Interrogatories and Requests for Production of Documents states:

1. Dana K. Joyce, Steven Dottheim and Lera L. Shemwell are shown on the service list as the attorneys for the Missouri Public Service Commission.

2. A diligent search indicates that the General Counsel's office, and none of the three attorneys listed on the service list, received a copy of the pleading by service.

3. The General Counsel's office did receive a copy of the pleading through the filing process because, of the fourteen copies required to be filed with the Commission, the General Counsel's office receives one of those copies.

Respectfully submitted,

DANA K. JOYCE General Counsel

Steven Dottheim

Chief Deputy General Counsel

Lera L. Shemwell Assistant General Counsel Missouri Bar No. 43792

Attorneys for the Staff of the Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102 (573) 751-7431 (Voice) (573) 751-9285 (Fax)

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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 14th day of October 1999.

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Service List For Case No. EC-99-553 Revised: October 14, 1999

Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102 Paul S. DeFord Lathrop & Gage 2345 Grand Boulevard, Suite 2500 Kansas City, MO 64108

William G. Riggins Kansas City Power & Light Company 1201 Walnut, P.O. Box 418679 Kansas City, MO 64141-9679

James W. Brew Brickfield, Burchette & Ritts, P.C. 1025 Thomas Jefferson Street, NW, 8th Floor Washington, DC 20007

James M. Fischer 101 West McCarty Street, Suite 215 Jefferson City, MO 65101