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MAURICE B. SOLTZ

March 17, 2004

RICHARD W. SHANKLAND

FILED²

MAR 19 2004

Secretary of The Public Service Commission
P.O. Box 360
Jefferson City MO 65102-0360

Missouri Public
Service Commission

Re: The Staff of the Missouri Public Service Commission v.
S.T. Ventures, L.L.C.
Case No. SC-2004-0341

Ladies and Gentlemen:

Enclosed herewith is an original and one copy of an Application to File Answer to Complaint Out of Time and an original and one copy of an Answer to the Complaint in the above-captioned action. Please file the original documents and return a copy of each to me with a stamp or other acknowledgment that it has been received by you.

Thank you for your attention to this matter.

Very truly yours,



Richard W. Shankland

RWS:ksa

CC: Gary Verhaeghe
S.T. Ventures, L.L.C.

Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

MAR 19 2004

The Staff of the Missouri Public Service
Commission,)

Complainant,)

v.)

S.T. Ventures, L.L.C.,)

Respondent.)

Missouri Public
Service Commission

Case No. SC-2004-0341

APPLICATION TO FILE ANSWER TO COMPLAINT OUT OF TIME

COMES NOW the Respondent, S.T. Ventures, L.L.C., and for its Application to file an Answer to the Complaint herein out of time, states as follows:

1. The Notice of Complaint issued by the Commission in the above-captioned action was dated February 10, 2004.
2. The Notice advises that an Answer or notification that the Complaint has been satisfied is due thirty (30) days from the date of the Notice per Commission Rule 4 CSR 240-2.070.
3. Pursuant to the cited Rule, an Answer to the Complaint or notification that the Complaint had been satisfied was due by March 11, 2004.
4. That the Notice of Complaint and the Complaint itself were mailed to the former address of the Respondent, S.T. Ventures, L.L.C.
5. Respondent S.T. Ventures, L.L.C. had informed the staff of the Commission of its change of address sometime in 2001.
6. The Notice of Complaint and the Complaint were delivered to the Respondent by certified mail, return receipt requested, on or about March 11 or 12, 2004.

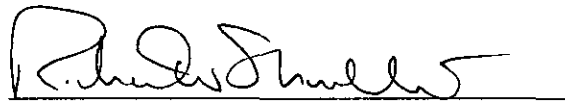
7. Respondent referred the Notice of Complaint and Complaint to the undersigned counsel on March 15, 2004.

8. This Application to file an Answer to the Complaint out of time and the proposed Answer to Complaint have been prepared and filed within a reasonable time after the service of the Notice of Complaint and the Complaint on Respondent.

9. The Answer to Complaint proposed to be filed accompanies this Application and sets forth Respondent's meritorious defense to the Complaint and indicates the failure to filing of an Annual Report for the calendar year 2002, which is the basis of the Complaint, has been satisfied.

WHEREFORE, Respondent S.T. Ventures, L.L.C., requests leave to file its Answer to the Complaint in this cause out of time.

SOLTZ & SHANKLAND APC



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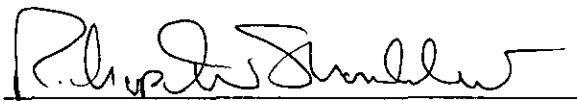
Attorney for Respondent

CERTIFICATE OF MAILING

I hereby certify that a copy of the above and foregoing Application to File Answer to Complaint Out of Time was mailed this 18th day of March, 2004, postage prepaid, to:

Bruce H. Bates
Associate General Counsel
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City MO 65102

John Coffman Esq.
Office of the Public Counsel
P.O. Box 7800
Jefferson City MO 65102

A handwritten signature in black ink, appearing to read "Richard W. Shankland", written over a horizontal line.

Richard W. Shankland