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August 16, 2001

Mr. Dale Hardy Roberts  
Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**FILED<sup>2</sup>**  
AUG 16 2001  
Missouri Public  
Service Commission

**RE: Missouri Public Service - Case No. GR-99-435**

Dear Mr. Roberts:

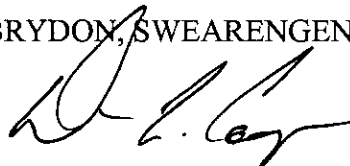
Enclosed for filing in the above-referenced proceeding please find an original and eight copies of UtiliCorp's Response to Staff's Request for Extension of Report Filing Date. Please stamp the enclosed extra copy of each "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



Dean L. Cooper

DLC/rhg

Enclosures

cc: Mr. Robert Franson, General Counsel  
Mr. Doug Micheel, OPC

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

In the Matter of Missouri Public Service's                     )  
Purchased Gas Adjustment Factors to be                     )  
Audited in its 1998-1999 Actual Cost Adjustment.                     )

Case No. GR-99-435

**FILED<sup>2</sup>**  
**AUG 16 2001**  
Missouri Public  
Service Commission

**UTILICORP'S RESPONSE TO  
STAFF'S REQUEST FOR EXTENSION OF REPORT FILING DATE**

**COMES NOW** UtiliCorp United Inc. ("UtiliCorp" or "Company") d/b/a Missouri Public Service ("MPS"), and, in response to the Missouri Public Service Commission ("Commission") Staff's ("Staff") Request for Extension of Report Filing Date, states to the Commission as follows:

1. This case was opened for the purpose of receiving the 1998-1999 Purchased Gas Adjustment filings and Actual Cost Adjustment filing of MPS. The Staff filed its original recommendation and memorandum after review of the 1998-1999 Actual Cost Adjustment (ACA) filing on September 1, 2000.

2. On February 6, 2001, the Commission granted a Staff Motion to Suspend Order to File Proposed Procedural Schedule and directed Staff to file a progress report in this case by June 6, 2001. The Staff complied with this order on June 6, 2001 and stated that it intended to file its final recommendation by August 31, 2001. The Commission responded by issuing its Notice Acknowledging Filing of Status Report on June 11, 2001.

3. The Staff, on August 9, 2001, has since filed its Request for Extension of Report Filing Date wherein it requests that the Commission extend the date for the filing of its final recommendation until September 30, 2001.

4. While UtiliCorp does not object to the Staff having an additional thirty days for the filing of its final Staff Recommendation, UtiliCorp hopes that this matter can soon progress toward a conclusion. Additionally, UtiliCorp is somewhat confused by the Staff's indication that the

extension is needed because it recently received information regarding events in a Minnesota investigation that “may be” significant.

5. This statement is curious because the fundamental differences between the systems and entities that serve the Minnesota and Missouri service territories result in very little overlap between UtiliCorp’s purchasing practices in the two states.

6. Interstate transportation service for Minnesota is provided by the Northern Natural Gas Pipeline (“NNG”), while Missouri is served through two different interstate pipelines – Panhandle Eastern Pipeline (“Panhandle”) and Williams Gas Pipeline Central (“Williams”). These pipeline differences create a variation in potential suppliers. The pipelines also vary in operational requirements. The most significant of these is the difference in balancing requirements. NNG and Panhandle are daily balancing pipelines and Williams is a monthly balancing pipeline. These balancing requirements result in different purchasing strategies, as well as differences in how to reconstruct what may have taken place in the past.

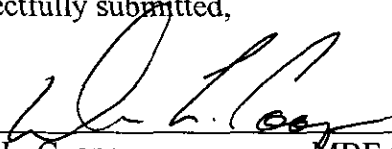
7. There is also a significant disparity between the systems in the storage volume available to UtiliCorp in each state. The fundamental difference in geographic location also contributes to this situation. Minnesota and Missouri are separated by enough distance that weather patterns differ greatly.

8. This having been said, UtiliCorp would like to reconfirm its commitment to working with the Staff to bring this matter to conclusion and to ensure that proper adjustments are made in accordance with UtiliCorp’s tariffs.

WHEREFORE, UtiliCorp does not object to a grant of the Staff’s Request for Extension of

Report Filing Date.

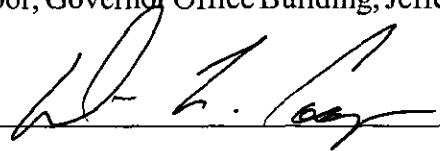
Respectfully submitted,

  
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ATTORNEYS FOR UTILICORP UNITED INC.  
D/B/A MISSOURI PUBLIC SERVICE

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was either hand-delivered or mailed, U.S. Mail, postage prepaid, on the 16<sup>th</sup> day of August, 2001, to: Robert V. Franson, Public Service Commission, Governor Office Building, Jefferson City, Mo 65101; and, Douglas Micheel, Office of the Public Counsel, 6th Floor, Governor Office Building, Jefferson City, Mo 65101.

  
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