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December 11, 2000

Missouri Public Service Commission
Attn: Secretary of the Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Mo. 65102-0360

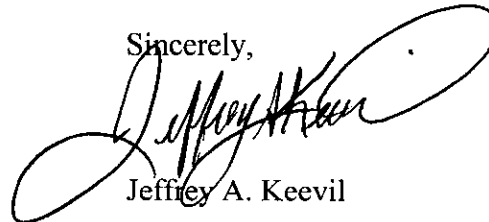
RE: Case No. GR-99-304
Missouri Gas Energy

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case are an original and the appropriate number of copies of a Unanimous Motion to Cancel Prehearing Conference and Filing of Procedural Schedule, to Hold Case in Abeyance, and For Expedited Treatment.

Copies of this filing have on this date been mailed or hand-delivered to counsel of record. Thank you for your attention to this matter.

Sincerely,



Jeffrey A. Keevil

JAK/er
Enclosures
cc: counsel of record

ORIGINAL

FILED³
DEC 11 2000

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

ORIGINAL
FILED³
DEC 11 2000
Missouri Public
Service Commission

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

Case No. GR-99-304

**UNANIMOUS MOTION TO CANCEL PREHEARING
CONFERENCE AND FILING OF PROCEDURAL
SCHEDULE, TO HOLD CASE IN ABEYANCE, AND
FOR EXPEDITED TREATMENT**

COMES NOW Intervenor, Kansas Pipeline Company ("KPC"), by and through its undersigned counsel, and submits the following Unanimous Motion to Cancel Prehearing Conference and Filing of Procedural Schedule, To Hold Case in Abeyance, and For Expedited Consideration pursuant to 4 CSR 240-2.080.

1. On December 1, 2000, the Commission, by delegation of authority, issued an Order Directing Filing, Setting Prehearing Conference and Requiring Filing of Procedural Schedule ("December 1 Order") in this case. The December 1 Order noted that on November 29, 2000, Staff filed a pleading herein advising the Commission that the appeal of another case (Commission Case No. GR-96-450) with certain similar issues had been decided by the Court of Appeals, and ordered Staff to file a copy of the Court of Appeals' opinion.

2. Based on the Staff's filing of November 29, 2000, the December 1 Order set a prehearing conference in this case for December 20, 2000, and set a filing date of December 27, 2000, for a proposed procedural schedule, apparently on the belief that the Court of Appeals' opinion in the appeal of Case No. GR-96-450 had resolved the issues

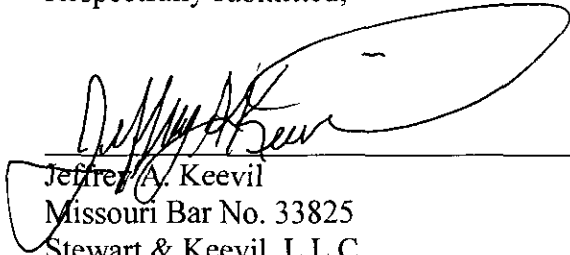
of similarity between that case and the instant case and that therefore there was no longer any need to hold this case in abeyance. However, as a review of the Court of Appeals' opinion in the appeal of Case No. GR-96-450 (which was filed herein by Staff December 6, 2000) shows, the Court of Appeals did not resolve any of the substantive issues raised in that appeal; instead, the Court of Appeals decided that the Commission's denials of Appellants' motions to dismiss in Case No. GR-96-450 were not final and appealable orders of the Commission, in effect granting the Commission's motion to dismiss the appeal on procedural grounds. Therefore, the issues of similarity between Case No. GR-96-450 and the instant case have yet to be finally determined.¹

3. Since the issues which are similar between Case No. GR-96-450 and this case have not been finally determined, request is hereby made that the prehearing conference set for December 20, 2000, and the proposed procedural schedule filing date of December 27, 2000, be cancelled, and that this case be held in abeyance pending final judicial determination of Case No. GR-96-450. Counsel for all parties to this case have indicated their agreement to these requests. Given the pendency of the currently-scheduled prehearing conference, that all parties to this case agree with the foregoing requests, and that this filing is being made as soon as possible after the December 1 Order, request is also made that this motion be given expedited treatment and that an order granting this motion be issued as soon as possible, preferably by December 15, 2000, due to the travel arrangement considerations of out-of-town and possibly out-of-state parties. All counsel have also agreed to this request.

¹ In its Order Directing Filing issued on October 10, 2000, the Commission stated that it would hold Case No. GR-99-304 in abeyance pending final judicial determination of Case No. GR-96-450.

WHEREFORE, KPC, with the unanimous agreement of counsel for the other parties to this case, requests that the Commission issue an order as soon as possible and preferably by December 15, 2000: (i) canceling the prehearing conference set for December 20, 2000, (ii) canceling the December 27, 2000, due date for the filing of a proposed procedural schedule, and (iii) holding this case in abeyance pending final judicial determination of Case No. GR-96-450 as previously ordered by the Commission in its October 10, 2000, Order Directing Filing.

Respectfully submitted,



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ATTORNEY FOR KANSAS
PIPELINE COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was delivered by first-class mail, or hand-delivery, to Robert J. Hack, counsel for Missouri Gas Energy; the Office of the Public Counsel; and the General Counsel's Office of the Missouri Public Service Commission on this 11th day of December, 2000.

