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July 10, 2000

FILED²

JUL 10 2000

Missouri Public
Service Commission

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

**RE: UtiliCorp United Inc. ("UCU") d/b/a Missouri Public Service -
Case No. GE-2000-639**

Dear Mr. Roberts:

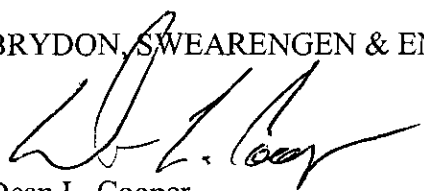
Enclosed for filing in the above-referenced proceeding please find an original and eight copies of UCU's Motion for Extension of Time to Respond to Staff Memorandum and Recommendation. Please stamp the enclosed extra copy "filed" and return same to me.

Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:


Dean L. Cooper

DLC/rhg
Enclosures
cc: Office of Public Counsel

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
JUL 10 2000

Missouri Public
Service Commission

In the Matter of the Application)
of UtiliCorp United Inc. d/b/a)
Missouri Public Service for a Waiver)
of Commission Rules 4 CSR 240-40.015)
and 4 CSR 240-40.016 Concerning)
Capacity Release Credits.)

Case No. GE-2000-639

**UTILICORP'S MOTION FOR EXTENSION OF TIME TO RESPOND TO
STAFF MEMORANDUM AND RECOMMENDATION**

COMES NOW UtiliCorp United Inc. ("UtiliCorp") d/b/a Missouri Public Service ("MPS"), and, as its motion for extension of time to respond to the Missouri Public Service Commission ("Commission") Staff's ("Staff") Memorandum and Recommendation, states to the Commission as follows:

1. On April 12, 2000, UtiliCorp filed with the Commission its application for waiver for good cause from Commission Rules 4 CSR 240-40.015(2)(A) and 4 CSR 240-40.016(3)(A), as to capacity release credits. UtiliCorp sought a waiver from these Commission rules to allow it to continue to operate in accordance with the process reviewed by the Commission in Cases No. GR-95-273 and GR-96-192.

2. On or about June 28, 2000, the Staff filed its Memorandum and Recommendation concerning UtiliCorp's application. The Staff recommended that the Commission grant a waiver with regard to capacity release transactions containing certain specific conditions. UtiliCorp's response to the Staff Memorandum and Recommendation would be due today, July 10, 2000.

3. UtiliCorp is in the process of assessing whether and how to reconcile its proposal with the conditions recommended by the Staff. UtiliCorp believes that with additional time it will be in

a position to either file a response with the Commission which specifically addresses the conditions identified by the Staff or enter into discussions with the Staff and the Office of the Public Counsel ("OPC") to explore the possibility of a stipulation and agreement. Both avenues would be beneficial to the Commission's processing of this case.

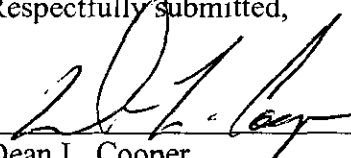
4. Accordingly, UtiliCorp asks that the date that it must respond to the Staff Memorandum and Recommendation be extended by ten (10) days, or until July 20, 2000.

5. Counsel for UtiliCorp has discussed this proposed extension with counsel for Staff and OPC. Both the counsel for the Staff and the counsel for the OPC stated that they have no objection to a grant of this extension.

WHEREFORE, UtiliCorp requests a Commission order:

- a) granting it an extension of ten (10) days, or until July 20, 2000, to respond to the Staff Memorandum and Recommendation; and,
- b) granting such further relief as may be necessary which is consistent with the relief requested herein.

Respectfully submitted,



Dean L. Cooper MBE #36592
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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 July 10, 2000, to: Robert V. Franson, Public Service Commission, 5th Floor, Truman State Office Building, Jefferson City, Mo 65101; and, the Office of the Public Counsel, 2nd Floor, Truman State Office Building, Jefferson City, Mo 65101.

