



Martha S. Hogerty
Public Counsel

State of Missouri

Bob Holden
Governor

Office of the Public Counsel
Governor Office Building
200 Madison, Suite 650
P.O. Box 7800
Jefferson City, Missouri 65102

Telephone: 573-751-4857
Facsimile: 573-751-5562
Web: <http://www.mo-opc.org>
Relay Missouri
1-800-735-2966 TDD
1-800-735-2466 Voice

March 21, 2001

FILED³

MAR 21 2001

Missouri Public
Service Commission

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

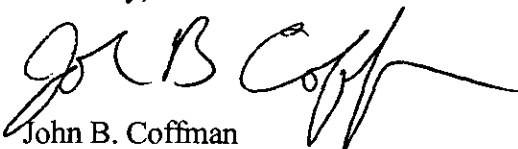
RE: UtiliCorp United Inc.
Case No. ET-2001-482

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case please find the original and eight copies of **Public Counsel Reply**. Please "file" stamp the extra-enclosed copy and return it to this office.

Thank you for your attention to this matter.

Sincerely,


John B. Coffman
Deputy Public Counsel

JBC:jb

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

MAR 21 2001

Missouri Public
Service Commission

In the Matter of UtiliCorp United, Inc.'s)
Tariffs Filed to Update the Rules and)
Regulations for Electric and to Increase)
the Interest Rate Paid on Deposits, the Late)
Payment Charge, the Reconnection Fee,)
and the Charge for Returned Checks)

Case No. ET-2001-482
Tariff No. 200100849

PUBLIC COUNSEL REPLY

COMES NOW the Office of the Public Counsel (Public Counsel) and for its Reply states as follows:

1. On March 19, 2001 UtiliCorp United Inc. (Company) filed its Suggestions of UtiliCorp United, Inc. in Opposition to Office of the Public Counsel's Motion to Dismiss or Suspend. Also on March 19, 2001, the Staff of the Commission (Staff) filed its Response and Motion to Consolidate.

2. Public Counsel supports Staff's motion to consolidate Cases No. ET-2001-482, GT-2001-484, and HT-2001-485. Staff is correct that these three cases should be consolidated because the issues in all three cases are virtually identical and a uniform result is desirable. Consolidation will greatly promote administrative efficiency and reduce the waste of duplicative filings.

3. Public Counsel is confused regarding Company's assertions in Paragraph 4 and 6 of its March 19, 2001 Suggestions. Company's claims that the Commission has approved the

tariffs in question. Public Counsel has not been served with a copy of the cover letter dated March 6, 2001 that was referenced in Company's Paragraph 4.

In Paragraph 6, Company asserts but does not explain how Public Counsel's motion could be prohibited by 4 CSR 240-2.065. The proposed effective date for the tariffs in question is still May 1, 2001, and Public Counsel believes that it has now fully complied with 4 CSR 240-2.065 in its request that the Commission suspend these tariffs and allow Public Counsel to provide testimony and suggestions in support of its arguments that the tariffs would constitute (1) unlawful single issue ratemaking, and (2) a detriment to Company's customers contrary to the Commission's decision in the merger case, Case No. EM-2000-292.

WHEREFORE, Public Counsel respectfully requests that the Commission consolidate cases numbered ET-2001-482, GT-2001-484 and HT-2001-485 and schedule an early prehearing conference as requested by Staff.

Respectfully submitted,

OFFICE OF THE Public Counsel

By: 

John B. Coffman (#36591)
Deputy Public Counsel
P. O. Box 7800
Jefferson City, MO 65102
(573) 751-5560
(573) 751-5562 FAX

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 21st day of March 2001:

Paul Boudreau
Brydon, Swearengen, & England
312 E. Capitol Avenue
Jefferson City, MO 65101

Steve Dottheim
General Counsel
P O Box 360
Jefferson City, MO 65101
