



Commissioners  
KELVIN L. SIMMONS  
Chair  
CONNIE MURRAY  
SHEILA LUMPE  
STEVE GAW  
BRYAN FORBIS

## Missouri Public Service Commission

POST OFFICE BOX 360  
JEFFERSON CITY, MISSOURI 65102  
573-751-3234  
573-751-1847 (Fax Number)  
<http://www.psc.state.mo.us>

April 3, 2002

ROBERT J. QUINN, JR.  
Executive Director  
WESS A. HENDERSON  
Director, Utility Operations  
ROBERT SCHALLENBERG  
Director, Utility Services  
DONNA M. PRENGER  
Director, Administration  
DALE HARDY ROBERTS  
Secretary/Chief Regulatory Law Judge  
DANA K. JOYCE  
General Counsel

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

**FILED**

APR 03 2002

Missouri Public  
Service Commission

**RE: Case No. GC-2001-593**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the **MOTION TO ACCEPT LATE FILING OF PROPOSED FINDINGS OF FACT AND CONCLUSION OF LAW** and **PROPOSED FINDINGS OF FACT AND CONCLUSION OF LAW**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Lera L. Shemwell  
Senior Counsel  
(573) 751-7431  
(573) 751-9285 (Fax)

LLS:sw  
Enclosure  
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

FILED

APR 03 2002

TXU Energy Services, Inc. and )  
Schreiber Foods, Inc. )

Missouri Public  
Service Commission

Complainant, )

v. )

Case No. GC-2001-593

Missouri Gas Energy, a division of )  
Southern Union, Co., )

Respondent. )

MOTION TO ACCEPT LATE FILING OF

PROPOSED FINDINGS OF FACT AND CONCLUSION OF LAW

COMES NOW the Staff of the Public Service Commission and for this Motion to  
Accept Late Filed Proposed Findings of fact and Conclusions of Law states:

1. By agreement of the Parties at the February 19, 2002 hearing, Proposed  
Findings of Fact and Conclusions of Law were to be filed on April 2, 2002.

2. Counsel for Staff was unexpectedly delayed in Agenda on April 2, 2002  
and was unable to complete this filing.

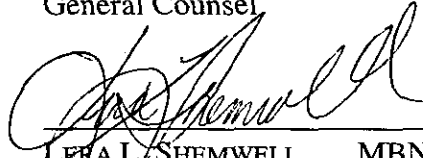
3. The filing has been completed as soon as possible after this unexpected  
delay.

WHEREFORE Staff requests that the Commission accept this filing one day late.

41

Respectfully submitted,

DANA K. JOYCE  
General Counsel



LERA L. SHEMWELL MBN 43792

Senior General Counsel

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

(573) 751-7431 Phone

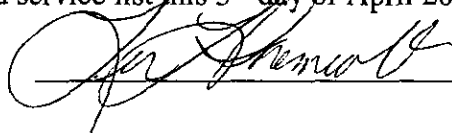
(573) 751-9285 Fax

[lschemwel@mail.state.mo.us](mailto:lschemwel@mail.state.mo.us)

Attorney for the Staff of the Commission

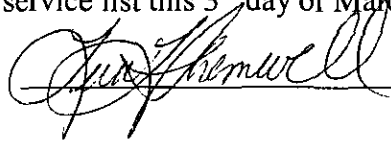
### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 3<sup>rd</sup> day of April 2002.



### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 3<sup>rd</sup> day of March 2002.



---

**Service List for  
Case No. GC-2001-593  
Revised: April 3, 2002 (SW)**

**Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102**

**Donald C. Otto, Jr., Esq.  
Attorney at Law  
901 Missouri Boulevard #163  
Jefferson City, MO 65101**

**Gary W. Duffy  
Brydon, Swearngen & England P.C.  
312 E. Capitol Avenue  
P.O. Box 456  
Jefferson City, MO 65102-0456**