

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

FILED³
JUL 10 2001

In the Matter of the tariff filing of Missouri)
Public Service ("MPS") a division of)
UtiliCorp United Inc., ("UtiliCorp") to)
Implement a general rate increase for)
Retail electric service provided to customers)
In the Missouri service area of MPS)

Case No. ER-2001-672

Missouri Public
Service Commission

**REQUEST FOR TRUE-UP AND
MOTION TO RESCHEDULE TRUE-UP HEARING**

Comes now UtiliCorp United Inc. ("UtiliCorp") d/b/a Missouri Public Service ("MPS"), by counsel, and for its request for true-up hearing and motion to reschedule true-up hearing respectfully states as follows to the Missouri Public Service Commission ("Commission").

1. In its Suspension Order and Notice issued June 21, 2001, the Commission ordered MPS to file, on or before July 11, 2001, its request for true-up audit and hearing in a separate pleading concurrent with its test year recommendation.

2. As reflected at page 6 of the prepared direct testimony of MPS witness Gary L. Clemens filed on June 8, 2001, MPS requests a true-up audit and hearing since the test year, as updated, will likely not include all of the appropriate costs of the Power Sales Agreement for electric power generated for MPS by the MEP Pleasant Hill, L.L.C. power unit. As a result, a true-up audit and hearing should be scheduled for March 26 and 27, 2002, for the purpose of examining the costs relating to the Power Sales Agreement and the costs of the other items as listed in paragraph 3 of this pleading.

3. The Commission's order states that the true-up request should specify a complete list of accounts or items of expense, revenues and rate base to be trued up to prevent any mismatch in those areas. Accordingly, MPS proposes that the true-up apply to the following items:

Rate Base:

1. Plant in Service.
2. Accumulated Depreciation.
3. Any deferred taxes associated with the true-up items.
4. True-up prices for natural gas, coal and oil for fuel inventories.
5. Effect on cash working capital for true-up items.

Capital Structure:

1. Cost of capital structure components.
2. Capital structure components.

Income Statement:

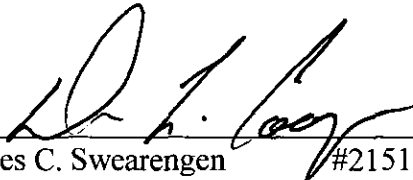
1. Customer growth revenues.
2. Payroll – employee levels and current wages.
3. Fuel and purchase power expense associated with customer growth.
4. Increase in purchase power demand charges.
5. Depreciation expense.
6. Rate case expense.
7. Related income tax effects.

4. The Commission has reserved the week of February 4, 2002, for a true-up hearing in this case. While the reservation of time for a true-up is appropriate, the dates need to be adjusted to deal with the fact that the costs subject to the true-up will not be booked by MPS and available for audit until February 15, 2002. Accordingly, a true-up hearing before that time would not be appropriate. MPS has discussed suitable dates for a true-up hearing with representatives of the Staff of the Commission. The Staff has

suggested to MPS that March 26 and 27, 2002, are appropriate dates for a true-up hearing and these dates are acceptable to MPS. Therefore, MPS suggests that the Commission reschedule the true-up hearing from the week of February 4, 2002 to March 26 and 27, 2002.

Wherefore, MPS submits its request for true-up audit and hearing as ordered, and moves that the true-up hearing be rescheduled to March 26 and 27, 2002.

Respectfully submitted,



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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered, on this 10th day of July, 2001, to:

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