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July 11, 2001

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

FILED²
JUL 11 2001
Missouri Public
Service Commission

RE: Missouri Public Service - Case No. ER-2001-672

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of UtiliCorp's Supplemental Response to OPC's Motion to Reject Tariff Filing. Please stamp the enclosed extra copy "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

Dean Cooper
Dean L. Cooper *ky Rg*

DLC/rhg

Enclosures

cc: Office of the Public Counsel
Office of the General Counsel
Mr. Stuart Conrad
Mr. Duncan Kinchloe

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²

JUL 11 2001

Missouri Public
Service Commission

In the Matter of the tariff filing of Missouri)
Public Service, a division of UtiliCorp)
United Inc., 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

**UTILICORP'S SUPPLEMENTAL RESPONSE TO
OPC'S MOTION TO REJECT TARIFF FILING**

Comes now UtiliCorp United Inc. ("UtiliCorp") d/b/a Missouri Public Service ("MPS") and for its Supplemental Response to OPC's Motion to Reject Tariff Filing, respectfully states as follows to the Missouri Public Service Commission ("Commission"):

BACKGROUND

1. On June 8, 2001, UtiliCorp filed revised tariff sheets designed to implement a general electric rate increase for its MPS operating division. On June 15, 2001, the OPC filed its Motion to Reject Tariff Filing wherein it claimed that the proposed MPS tariff sheets should be rejected on the grounds that UtiliCorp did not file tariffs designed to implement a general electric rate increase for its SJLP operating division.

2. On June 25, 2001, UtiliCorp filed its Response to OPC's Motion to Reject Tariff Filing. In that Response, UtiliCorp closed by stating in part:

Finally, UtiliCorp now anticipates that on or before July 13, 2001, it will file with the Commission revised tariffs designed to implement a general electric rate increase for its SJLP operating division. Consequently, the

Commission will know by mid-July whether it will have before it tariffs involving the electrical operations of both of UtiliCorp's Missouri operating divisions. Whether or not this will satisfy the OPC's apparent desire for more rate increase requests remains to be seen.

(Response, p. 10).

SUPPLEMENTAL RESPONSE

3. Since the filing of its Response, UtiliCorp has made a management decision to not seek a general electric rate increase for its SJLP operating division at this time.

4. UtiliCorp seeks by this filing to provide this additional information and ensure that the Commission has current information before it when it rules on the OPC's Motion to Reject.

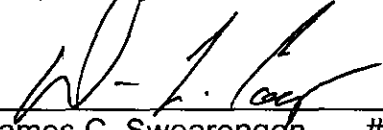
NO CHANGE IN POSITION

5. This supplemental response does not change UtiliCorp's opposition to the OPC Motion to Reject, nor the reasons supporting its opposition. UtiliCorp continues to believe that the OPC's Motion should be denied because there is no statutory authority, no regulatory requirement, no judicial or Commission precedent and no factual-based compelling reason to require that a public utility propose new rates for all its operating divisions simultaneously when those divisions provide service under separate tariffs and certificates of public convenience and necessity and are otherwise treated separately by the utility and/or the Commission for operating, ratemaking, reporting and other purposes.

WHEREFORE, UtiliCorp respectfully requests that the Commission:

- (a) deny the OPC's Motion to Reject Tariff Filing; and,
- (b) grant such further relief as the Commission deems appropriate.

Respectfully submitted,


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Attorneys for UtiliCorp United Inc.

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 11th day of July, 2001, to:

Office of the General Counsel
Missouri Public Service Commission
Governor State Office Building
P.O. Box 360
Jefferson City, MO 65102-0360

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