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July 25, 2001

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

FILED²
JUL 25 2001
Missouri Public
Service Commission

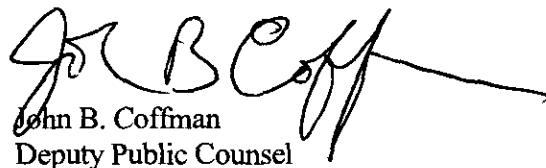
RE: UtiliCorp United Inc.
Case No. ER-2001-672

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case please find the original and eight copies **PUBLIC COUNSEL'S TEST YEAR RECOMMENDATION**. 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

JUL 25 2001

Missouri Public
Service Commission

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

PUBLIC COUNSEL'S TEST YEAR RECOMMENDATION

COMES NOW the Office of the Public Counsel (Public Counsel), and for its Test Year Recommendation states as follows:

1. On June 8, 2001, UtiliCorp United, Inc. (Company) recommended that the Public Service Commission (Commission) utilize a test year in this case covering the twelve months ending December 31, 2000. On July 10, 2001, Company submitted a revised recommendation that the Commission utilize a "test year as updated" up through and including June 30, 2001, not including costs that Company is requesting be recognized in a true-up. Test Year Recommendation, p. 1.

2. Public Counsel's recommended test year in this case is simply the twelve months ending June 30, 2001. If the Company believes that a test year should be "updated" through June 30, 2001, then this date might as well serve as the end of the twelve month "test year," eliminating the need for any known and measurable updating. Simply adopting a test year that covers July 1, 2000 through June 30, 2001 will allow for the most recent set of historical information that could be audited and reviewed by all parties

with sufficient time to prepare testimony to be filed within normal time frames in this case.

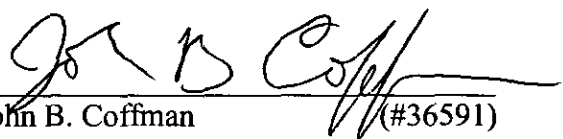
3. It would not be in the public interest to start with a test year that examines the twelve months ending December 31, 2000, because during this time period, Missouri Public Service Company was itself a separate "electrical corporation" pursuant to Section 386.020 RSMo. 2000 and had not been merged into the new regulated entity that is Company. Therefore, calendar year 2000 is not at all representative of Company's **current** corporate structure nor is it a realistic picture of Company's **current** financial situation.

WHEREFORE, Public Counsel respectfully submits its recommendation of a test year ending June 30, 2001 because it would allow the most current available financial information to be audited and would be more representative of Company's ongoing cost of service than a test year that started with calendar year 2000.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By:


John B. Coffman

(#36591)

Deputy Public Counsel

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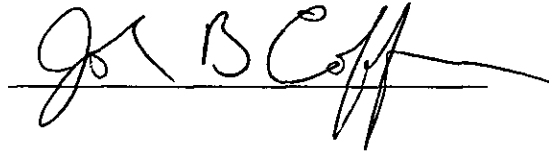
(573) 751-5562 FAX

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 25th day of July 2001:

General Counsel
Missouri Public Service Commission
P O Box 360
Jefferson City, MO 65102

James C. Swearengen
Brydon, Swearengen & England P.C.
P O Box 456
Jefferson City, MO 65102

A handwritten signature in black ink, appearing to read "JCS", is written over a horizontal line.