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November 1, 2001

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

**FILED<sup>2</sup>**  
NOV 01 2001

Missouri Public  
Service Commission

**Re: Case No. ER-2001-672**

Dear Mr. Roberts:

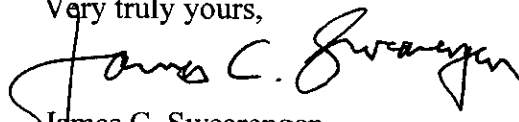
Enclosed for filing in the referenced case on behalf of UtiliCorp United Inc. d/b/a Missouri Public Service, please find an original and eight (8) copies of UtiliCorp's Response to Staff's Motion to Modify Procedural Schedule, for a Commission Order Compelling Missouri Public Service, A Division of UtiliCorp United Inc., to Answer Data Requests Issued by the Staff, to Shorten the Time to Respond to Data Requests, and for Expedited Treatment.

Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

A copy of this filing is being provided to all parties of record.

I thank you in advance for your cooperation in this matter.

Very truly yours,

  
James C. Swearengen

JCS/lar

Enclosure

cc: All Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>  
NOV 01 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

**UTILICORP'S RESPONSE TO STAFF'S MOTION  
TO MODIFY PROCEDURAL SCHEDULE, FOR A  
COMMISSION ORDER COMPELLING MISSOURI PUBLIC  
SERVICE, A DIVISION OF UTILICORP UNITED, INC. TO ANSWER DATA  
REQUESTS ISSUED BY THE STAFF, TO SHORTEN THE TIME TO  
RESPOND TO DATA REQUESTS, AND FOR EXPEDITED TREATMENT**

COMES NOW UtiliCorp United Inc. ("UtiliCorp") d/b/a Missouri Public Service ("MPS"),  
by counsel, and for its Response to Staff's Motion to Modify Procedural Schedule, for a Commission  
Order Compelling Missouri Public Service, A Division of UtiliCorp United, Inc. to Answer Data  
Requests Issued by the Staff, to Shorten the Time to Respond to Data Requests, and for Expedited  
Treatment, respectfully states as follows to the Missouri Public Service Commission  
("Commission"):

**Background**

1. The Staff's motion was anticipated by MPS and embraces the new procedural dates  
which MPS suggested to the Staff in an effort to resolve the discovery matter without assessing  
blame for the situation. However, because of MPS's effort to reach an accommodation and MPS's  
belief that it had an understanding with the Staff as to a resolution, certain statements in the Staff's  
motion and accompanying verified statements come as a complete surprise. As stated, in an effort  
to be helpful and resolve the discovery matter, MPS indicated to the Staff its willingness to support  
a Staff request to modify the procedural schedule as set out in paragraph 1 of the prayer of the Staff's

motion notwithstanding the fact that these new dates would impose a hardship on MPS. Furthermore, MPS also indicated its willingness to answer all outstanding Staff data requests by a date to be determined and to answer new Staff data requests in accordance with Commission rules, matters which are the subject of paragraphs 2 and 3 of the prayer. Finally, MPS indicated its willingness to "make its best efforts" to answer Staff data requests submitted after a date to be determined within ten (10) days and to answer Staff data requests submitted after January 8, 2002 within seven (7) days, provided that other parties did the same, matters which are the subjects of paragraphs 4 and 5 of the prayer. MPS, however, understood that its "best efforts" offer was not acceptable to the Staff, but believed this to be the only real issue outstanding between the parties. In view of the foregoing, certain allegations concerning MPS contained in both the motion and supporting affidavits were not only unanticipated, but are completely unnecessary from MPS's point of view. More importantly said allegations are, to a considerable extent, misleading, inflammatory and fail to point out that MPS has heretofore made a good faith effort to cooperate fully and to respond to Staff's discovery as promptly as possible under the circumstances. MPS submits that given its willingness to accommodate the Staff and its belief that an understanding had been reached, the Staff's tactic is clearly unwarranted. The reality is that the Staff itself must shoulder considerable responsibility for the situation in which it now finds itself.

#### History of the Staff's Audit

2. On April 4, 2001, more than two months prior to the filing of its rate case, representatives of MPS met with representatives of the Staff to discuss the pending filing. At that time, MPS requested that the Staff provide to it as soon as possible the first 100 or so Staff data requests so that MPS could begin processing same and respond as soon as possible. The first 100

Staff data requests were not provided to MPS until June 15, 2001. The next big set of Staff data requests, 119-206, were not provided until the August 20-28 period, more than 60 days later. MPS cannot be held responsible for this failure on the part of the Staff.

3. The Staff did not commence its on-site audit of MPS until August 13, 2001, more than two months after the case was filed. The apparent reason for this delay in commencing the audit is set out in paragraph 11 of the Staff's motion. MPS cannot be at fault for these circumstances.

MPS's Efforts to Assist the Staff

4. MPS has taken steps to assist the Staff. At a June 12 meeting with Staff member Cary Featherstone, MPS suggested a presentation for all parties concerning UtiliCorp's new financial accounting system (PeopleSoft) so that the Staff and others could become familiar with new system. Mr. Featherstone thought this was a good idea. Beginning in August when the Staff arrived on-site, MPS repeatedly tried to schedule this presentation. The Staff was not available until August 27-28 at which time an eight (8) hour presentation was held. The following are some of the highlights of that presentation:

- Explanation of code block fields and code block values, the heart of accounting system. (Understanding of codes is imperative for analysis work.)
- Explanation of how the automated overhead allocation process works and the resulting details.
- Explanation of MPS witness Bev Agut's Schedules BRA-2 through BRA-3. Emphasis on how one source allocated transaction can create over 50 transactions in the general ledger.
- Demonstration of PeopleSoft Query tool and its ability to provide more specific

information than a voluminous hardcopy of the general ledger detail.

- Offer to make a MPS representative available to produce drill down queries of system, (obtaining detailed information from the accounting system) including allowing Staff personnel present during processing. (This method worked well with the Kansas Corporation Commission Staff in the recently completed WestPlains-Kansas rate case. On October 12, MPS was first made aware that the above offer was not acceptable and that the Staff wanted a hard copy of the general ledger.)

#### The General Ledger

5. The UtiliCorp total company general ledger (MPSC-0070), if printed for 18 months, would be over 250,000 pages (234,000 for existing BU's plus SJLP for 6 months). This totals 50 boxes of paper (500 sheets per ream, 10 reams per box). While MPS and the Staff may differ on the definition of the "size" of room, 50 boxes of paper will go a long way toward filling an 8' x 10' room. At a meeting on October 16, the Staff was shown a report titled "FERC Trial Balance Activity Report" for the MPS division for a one-month period and was repeatedly asked if it desired all months to be printed. The Staff again declined this offer and instead has recently requested specific code block detail. The Steve Traxler memo of October 17 was the first time the Staff requested a SJLP 2000 general ledger or any SJLP general ledger. The SJLP 2000 general ledger was provided on October 19, two days after the initial request. Access to the general ledger query tool was denied on the basis that an inexperienced and untrained user could extract the incorrect information and rely on this incorrect information. Access was never denied on the basis suggested by Mr. Traxler at page 7 of his statement.

Trial balance reports, which provide general ledger account balances for plant, reserves, materials and supplies, prepayments along with all other account balances (revenues, operating and maintenance expenses, taxes, etc.), were provided to the Staff on June 29 (MPSC-0070).

Changes in MPS's Updated Filing – Allocation of Corporate Overhead Costs

6. At the August 27 meeting, Staff called to MPS's attention the fact that MPS had in effect "doubled up" on adjustments for the change in overhead allocations and separate annualizations of other costs. The Staff indicated that the method MPS utilized in its direct filing was not acceptable. MPS agreed that it would need to work through this issue. From August 28 through August 29, MPS again heard many comments that the method utilized in its direct filing was not acceptable. On August 30, MPS representatives met with the Staff to explain the preparation of the payroll annualization adjustment. At that meeting, a proposed method of preparing the updated overhead allocation adjustment was presented for payroll as well as all other expense items (depreciation, other taxes, benefits, etc.). This proposed method was a change from that utilized in MPS's direct case, but it was at Staff's insistence that another method be prepared.

This new method is one reason more time was needed to prepare the updated case than originally anticipated. A MPS representative met with Staff representatives Chuck Hyneman and Steve Traxler numerous times during the month of September to explain the new overhead allocation methodology. The Staff never indicated that this method would NOT be satisfactory. By late September, the Staff did propose another method, but it was too late at that point to start over with the preparation of the MPS case update.

### Reference to KCC Order on Accounting Records

7. The Kansas Corporation Commission (Joe White) complimented UtiliCorp on its efforts prior to filing to educate Staff about UtiliCorp's Corporate Cost Allocation process. This was basically the same information provided to the Missouri Staff at the August 28 presentation. The KCC order is directed at issues between the billing system reports and the general ledger regarding billing determinants.

### The Situation with respect to the Data Requests

8. To date, the Staff has submitted to MPS over 550 data requests many with multiple components. (Other parties have submitted an additional 519 data requests). Of this total, the Staff notes approximately 50 data requests which it claims have been outstanding for more than twenty days (see Schedule SMT attached to the verified statement of Steve M. Traxler). The status of these 50 data requests is set out on Appendix A, attached hereto and made a part hereof for all purposes. Most of these data requests have been answered and the balance (less than 10) will be answered by November 5, 2001, as requested by the Staff's motion. Mr. Traxler also included at page 14 of his statement a list of 22 data requests that he characterized as examples of significant delays in getting responses fundamental to completing the audit. Attached, as Appendix B, is MPS's response to each of the alleged delayed responses. Clearly the Staff itself must accept that its own inability to effectively process data requests has accounted for a significant part of the alleged delay. The Commission must ask how MPS can be held accountable for data requests that were never received; for data requests that the Staff did not interpret correctly; for data request responses the Staff held for 105 days before requesting a meeting with representatives of MPS. MPS's average time to

answer all data requests has been 18.76 days. Excluding the 22 data requests cited by Mr. Traxler, the average is 18.51 days. Using the Staff's math, the average is 19.73 days.

#### Depreciation Discovery

9. No depreciation study is required in this case. MPS's depreciation rates were last established by this Commission in 1998. This Commission's own rules do not require MPS to file a depreciation study before 2002. Staff has apparently unilaterally decided to complete a depreciation analysis that is not required for this case. MPS does not agree that the information can be easily put into the format required by the Staff. If it is as simple as Staff states, the Staff can easily undertake this task itself. MPS is not the only company that cannot supply this information in the form the Staff has chosen to use. In the last Empire District Electric Company rate case, the Staff also requested the Commission to order Empire to supply like information in the same chosen Gannett-Fleming format (See Staff Brief page 18 and Staff Reply Brief page 4, Case No. ER-2001-299). The Commission's Report and Order is silent on this issue. MPS has supplied the requested information to the Staff as quickly as possible. A cartridge containing depreciation study database for the accounting years 1961 through 1997 was supplied. To assist in reconciling the data, a hardcopy of the data report was included. The report listed plant activity by accounting year and vintage year for each account. UtiliCorp's current IT standard is to provide data on cartridge as tape technology is no longer part of UtiliCorp's IT footprint. The data is not available in the Gannett Fleming format and would require additional costs to convert. The record layout of the data was also forwarded.



### Plant Reconciliation

10. MPS believes that the information provided in DR 302, the plant provided in its updated case, and the plant ledgers do tie in total. It appears from a Staff workpaper that the Staff provided in DR 472 which shows three different balances from the three documents which Mr. Featherstone identifies on page 10 of this verified statement, is caused by input and formula problems in the Staff workpaper. If this problem would have been brought to MPS's attention before Staff's filing, MPS could have had a chance to point out these Staff input problems and this example may not of been used.

### Conclusion

11. MPS believes that it has cooperated fully with the Staff and other parties throughout this proceeding. Contrary to the Staff's allegations, MPS has had employees working evenings and weekends to respond to the data requests issued by the Staff. As indicated, MPS had anticipated the overburdening nature of the Staff's typical data requests and had offered to begin the discovery process even before the case was filed. The Staff chose to ignore MPS's offer. Admittedly, some data requests have not been answered promptly, but the extent of the problem has been grossly exaggerated by the Staff. MPS cannot be faulted for the Staff's failure to commence discovery back in April or for the two month delay in its on-site audit or for its two month delay in agreeing to learn about the new accounting system or its failure to accept MPS's offer to produce drill down queries of the system. These Staff failures cannot justify 50 pages of testimony chastising MPS with inflammatory comments apparently designed to prejudice MPS before the Commission, especially in light of MPS's stated willingness to work with the Staff to modify the procedural schedule and timely answer data requests.

12. In an effort to avoid a major confrontation with the Staff, MPS had agreed to change the procedural schedule even though the rationale was questionable. Again, it is clear that the Staff has made decisions in this case which have complicated its own ability to complete its testimony in a timely manner. MPS should not bear the burden of these decisions. Now, notwithstanding the Staff's last minute effort to assign blame to MPS, in order to move this case forward in a positive fashion, MPS will stand by its agreement to support the modified dates for the procedural schedule as set out in paragraph 1 of the prayer of Staff's motion. In addition, MPS will stand by its agreement concerning the data requests referenced in paragraph 2 of the prayer and respond to same by 3:00 p.m. Monday, November 5, 2001. In addition, with respect to paragraph 3 of the prayer and all Staff data requests which are not presently overdue, MPS will either object within ten (10) days of the date issued or provide responses within twenty (20) days. With respect to paragraphs 4 and 5 of the prayer, MPS will make a good faith effort to respond or object to Staff data requests issued after Monday, November 5, 2001 to and including January 8, 2002, within ten (10) days and a good faith effort to answer or object to Staff data requests issued after January 8, 2002, within seven (7) days.

Respectfully submitted,




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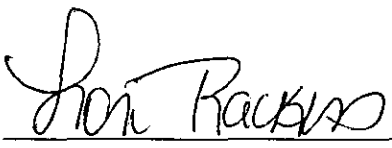
Attorneys for UtiliCorp United Inc. d/b/a Missouri Public Service

County of Cole        )  
                              )       ss  
State of Missouri     )

Gary L. Clemens, being first duly sworn, states that he has read the attached response and appendices thereto which is being submitted on behalf of UtiliCorp United Inc. d/b/a Missouri Public Service in Case No. ER-2001-672 and that the matters and things stated in said response and appendices thereto are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Gary L. Clemens

Subscribed and sworn to before me this 1<sup>st</sup> day of November, 2001.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:



Certificate of Service

I hereby certify that a true and accurate copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered, on this 15<sup>th</sup> day of November 2001, to:

Mr. Nathan Williams  
Missouri Public Service Commission  
Governor State Office Building  
P.O. Box 360  
Jefferson City, MO 65102

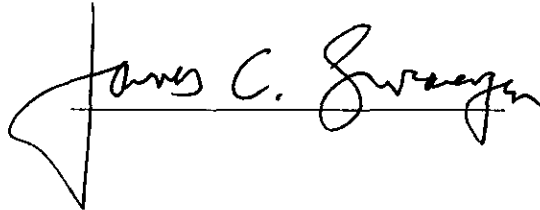
Mr. John Coffman  
The Office of the Public Counsel  
6<sup>th</sup> Floor, Governor State Office Building  
P.O. Box 7800  
Jefferson City, MO 65102

Mr. Stuart Conrad  
Finnegan, Conrad & Peterson  
1209 Penntower Center  
3100 Broadway  
Kansas City, MO 64111

Mr. Duncan E. Kinchloe  
Missouri Public Utility Alliance  
2407 W. Ash  
Columbia, MO 65203-0045

Mark Comley  
Newman Comley & Ruth  
601 Monroe  
Suite 301  
Jefferson City, MO 65101

Mr. Jeremiah Finnegan  
Finnegan, Conrad & Peterson  
1209 Penntower Center  
3100 Broadway  
Kansas City, MO 64111

A handwritten signature in black ink, reading "James C. Swearingen", is written over a horizontal line. To the left of the signature, there is a large, stylized, handwritten mark that resembles a checkmark or a large letter 'C'.

**Utilicorp United Inc. - Missouri Divisions**  
**Staff Data Requests Outstanding more than 20 Days**

		Issue Date	Days Outstanding	Current Status
<b>Corporate Overhead Allocations</b>				
DR 111	MPS workpapers - provide Total & Allocated cost by department to MPS in 2000	8/3/01	84	
DR 215	Consolidated Income Statement for 2000 consistent with SEC form 10K	8/29/01	58	
DR 272	Expense report copies for UCU officers and department heads	9/7/01	49	
DR 292	Explanation for budget variances in corporate overhead costs for year 2000	9/11/01	45	
DR 393	Peoplesoft modifications	10/5/01	21	
DR 394	Time keeping - prior Commission orders	10/5/01	21	
DR 396	Direct reports to UCU Executives	10/5/01	21	
DR 349	Explain supplemental executive payments referred to as Perg.s	9/28/01	28	
DR 397	ESF department salaries and benefits	10/5/01	21	
<b>Electric Revenue</b>				
DR 137	List Industrial customers for SJLP and those subject to interruptible tariff	8/20/01	67	
DR 139	Provide SJLP historical curtailment for interruptible service through June 30, 2001	8/20/01	67	
DR 325	Update the response to DR 3501 for months in 2001	9/24/01	32	
DR 330	Clarify response to DR 16	9/24/01	32	
<b>Advertising Expense</b>				
DR 81	Copies of advertising adds for test year 2000 costs	6/15/01	133	
<b>Payroll and Benefits</b>				
DR 279	Provide documentation supporting supplemental pay plans/awards identified in DR 88	9/7/01	49	Open
DR 352	Support for SJLP supplemental retirement plan costs of 1.5 million	9/28/01	28	
DR 332	Provide the cost of the UCU Supplemental Retirement Plan & Capital Accumulation Plan	9/24/01	32	
DR 378	Incentive compensation follow up	10/3/01	23	Open

**Utilicorp United Inc. - Missouri Divisions  
Staff Data Requests Outstanding more than 20 Days**

		Issue Date	Days Outstanding	Current Status
<b>Merger Costs</b>				
DR 380	Closing documents for UCU/SJLP merger	10/4/01	22	
DR 331	Copies of minutes of the SJLP advisory board and monthly fee calculation	9/24/01	32	
DR 333	Provide quantification of savings resulting from the UCU/SJLP merger & supporting analysis	9/24/01	32	
DR 383	Costs with merger premium charged to MPS	10/4/01	22	
DR 384	Merger impacts on SJLP	10/4/01	22	
DR 385	Merger premiums & costs charged to SJLP	10/4/01	22	
DR 388	Timing for expected merger savings	10/4/01	22	
DR 398	Meyers merger testimony - tracking merger savings/costs	10/5/01	21	
DR 399	Meyers activity numbers/costs for SJLP	10/5/01	21	
DR 400	Meyers incremental non-payroll costs for SJLP	10/5/01	21	
DR 401	Transition team reports, timelines	10/5/01	21	Open
<b>Income Tax</b>				
DR 289	Provide income tax workpapers not provided with UCU's direct filing	9/11/01	45	
DR 291	Identify tax timing differences for MPS & SJLP and reconcile Book/Tax basis	9/11/01	45	
<b>Aires Combined Cycle Unit</b>				
DR 312	Provide studies supporting decision to purchase power from an affiliated company	9/20/01	36	
DR 313	Provide studies supporting decision for purchase power contract with Aires plant vs build new	9/20/01	36	
DR 387	FERC orders on merchant plant treated as EWG	10/4/01	22	
DR 368	Test power support for Aires plant	10/2/01	24	

**Utilicorp United Inc. - Missouri Divisions**  
**Staff Data Requests Outstanding more than 20 Days**

		Issue Date	Days Outstanding	Current Status
<b>Fuel &amp; Purchase Power Costs</b>				
DR 310	Explain contradictory freight charge costs provided in response to DR's 29 and DR 63	9/19/01	37	Open
DR 229	Monthly fuel prices for SJLP units - (Gas costs)	9/28/01	57	
DR 45	Historical energy & demand costs per MWH, purchase power and interchange sales	6/12/01	136	
<b>Maintenance Expense</b>				
DR 341	Actual turbine maintenance costs - 1997- 2001	9/28/01	28	
<b>Property Tax</b>				
DR 335	Provide plant, CWIP, materials & supplies & inventory amounts supporting assessed values	9/25/01	31	
<b>Rate Base</b>				
DR 340	Provide the monthly amounts for Account 165999 - Prepayments Other	9/26/01	30	
DR 360	Prepayments data	10/1/01	25	
DR 389	Allowance for Funds during Construction - AFUDC rate	10/4/01	22	
DR 390	Accounting authority orders	10/4/01	22	
<b>General Information</b>				
DR 364	Position papers on restructuring	10/2/01	24	
DR 379	Questions on Gary Clemens testimony	10/3/01	23	
<b>Capital Leases</b>				
DR 367	RFP's issue for Greenwood lease	10/2/01	24	
DR 377	Greenwood plant lease expense	10/3/01	23	
<b>Cash Working Capital</b>				
DR 376	Accounts Receivable sales - banking fees	10/3/01	23	Open
DR 392	Payment dates for Purchase Power invoices	10/4/01	22	

## DATA REQUEST TABLE

<u>Data Request</u>	<u>Description</u>	<u>Issue Date</u>	<u>Response Date</u>	<u>No. Days Outstanding</u>
1	Workpapers supporting MPS filing (Income Tax)	6/12	NP	136

**RESPONSE:**

*Information has been provided to Staff. The copies were accidentally left out of the workpapers.*

13	Customer Counts by rate code through 6/30/01	6/12	10/23	133
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**RESPONSE:**

*Initial response provided on June 25, 2001. Updated for June data on October 15, 2001. Per discussion with Staff, the format was changed and provided on October 23, 2001.*

45	Historical purchase power energy and demand costs per Mwh	6/12	NP	133
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**RESPONSE:**

*Provided data to Staff on June 29, 2001. Staff sent insufficient letter on October 26, 2001. Met with Staff on October 29, 2001 to show them the original response had the information they had asked for. After the meeting, Staff agreed information had been provided. We updated the Data Request for June and July data on October 3, 2001.*

48	UtiliCorp organizational chart	6/15	9/6	83
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**RESPONSE:**

*Company did not receive Data Request 48 until September 5, 2001. Staff sent Data Requests 1-47 on June 12, 2001. When provided Data Requests 48-97, as stated by Cary Featherstone on June 15, 2001, number 48 was missing. Skipping Data Request numbers has been common during the audit because of 9 different auditors. After I identified the problem and met with Staff, I provided 5 copies of the Organizational Chart on September 6, 2001.*

69	Workpapers in electronic format (disk)	6/15	8/30	76
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**RESPONSE:**

*Not sure why this took so long.*

70	Monthly general ledger	6/15	10/22	129
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**RESPONSE:**

*A trial balance was provided to Staff on June 29, 2001 after stating that a full general ledger is not practical to use. After hearing Staffs frustration on October 12, 2001, 105 days after the trial balance had been provided, we met again on October 16, 2001. An additional report was created on October 22, 2001, but still was not a full general ledger. Staff said that this would work.*

81	Copies of Advertisements	6/15	NP	133
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**RESPONSE:**

*Company is only seeking recovery of Safety and Informational advertisements. The Safety and Informational advertisements were provided on October 31, 2001. The remaining advertisements will be provided in a few days. Advertising is now handled at the corporate level for all UtiliCorp divisions.*

88	Copies of Incentive Compensation Plans	6/15	10/18	125
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**RESPONSE:**

*The Human Resources Department is comprised of several functional groups. Determining which functional group(s) could provide the information resulted in some delays.*

95	List of outside services by vendor	6/15	9/27	104
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**RESPONSE:**

*The original response provided data through May 2001 and was provided to Staff on June 29, 2001. The Data Request was updated with June data on September 27, 2001. The MPS rate case update caused a delay in providing Data Request updates.*

112	PeopleSoft accounting system costs	8/3	10/22	80
113	Departments charging costs to international operations	8/3	10/22	80
114	Copies of responses to OPC DRs 1001, 1009, 1010, 1012 and 1019	8/3	10/9	67

**RESPONSE:**

*Data Requests 111-114 were not received or misplaced. We received a copy on October 4, 2001 and answered them as quickly as possible.*

136	Change in power requirements for SJLP industrial customers	8/20	10/9	50
137	List of SJLP Industrial Customers Subject to Interruptible Service	8/20	NP	67

**RESPONSE:**

*Data Requests 137 and 139 was completed on October 29, 2001 and October 30, 2001, respectively. The data request responses were delayed due to the transition from St. Joe Light & Power to Missouri Public Service. Determining the group(s) responsible for providing the information requested caused some delays.*

208	Copy of UtiliCorp's legal flowchart	8/29	10/9	41
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**REPOSE:**

*My fault, working on updated case and this one fell through the cracks.*

215	Consolidated income and balance sheet, U.S. Utilities, International and Other	8/29	NP	58
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**RESPONSE:**

*Extra time was needed to search for a report that was available for all UCU business units in the FERC Form 1 format.*

229	Monthly fuel prices for SJLP units (Gas Costs)	8/30	NP	57
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**RESPONSE:**

*We are still trying to locate all of the St. Joe Light & Power historical data since the merger was completed.*

272	Copies of expense reports for officers and department heads	9/7	NP	49
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**RESPONSE:**

*Human Resources did not realize the magnitude of this Data Request. An extension should have been requested for this Data Request.*

289	Income tax workpapers and support	9/11	NP	45
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**RESPONSE:**

*This information has been provided.*

291	Timing differences and basis reconciliation	9/11	NP	45
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**RESPONSE:**

*This information has been provided.*

292	Explain budget variances in 2000 for specific UCU departments	9/11	NP	45
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**RESPONSE:**

*Data provided on October 31, 2001. Not sure why the response was delayed.*

310      Difference in freight rates – DR's 29 & 63    9/19      NP                      37

**RESPONSE:**

*This information has been provided. Met with Bill Harris in early October to discuss and he provided the information requested. The data was not formalized in a Data Request response until October 29, 2001.*