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December 7, 2001

FILED²

DEC 07 2001

**Missouri Public
Service Commission**

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Case No. ER-2001-672

Dear Judge Roberts:

Please find enclosed for filing in the referenced matter an original and eight copies of a Motion for Leave to File Direct Testimony One Day Out of Time, along with the Direct Testimony of Russell C. Widmar.

The testimony contains a facsimile of the affidavit of Mr. Widmar. The Commission will be provided with the original affidavit as soon as it is received.

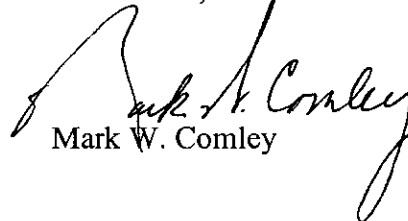
The testimony and motion have been e-mailed and faxed to all parties of record.

Please contact me if you have any questions regarding this filing. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:


Mark W. Comley

MWC:ab

Enclosure

cc: Office of Public Counsel
General Counsel's Office
William D. Geary
All parties of record

FILED²

DEC 07 2001

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of the Tariff Filing of Missouri Public)	
Service (MPS), a Division of UtiliCorp United, Inc.,)	Case No. ER-2001-672
to Implement a General Rate Increase for Retail)	Tariff No. 200101173
Electric Service Provided to Customers in the)	
Missouri Service Area of MPS.)	

MOTION FOR LEAVE TO FILE DIRECT
TESTIMONY ONE DAY OUT OF TIME

Comes now the City of Kansas City (City), intervener in this cause, by and through counsel, and pursuant to 4 CSR 240-2.050(3), requests leave to file certain testimony one day out of time. In support thereof, the City submits the following to the Commission:

1. Pursuant to the procedural schedule approved in this case, direct testimony of the parties was due to be filed on December 6, 2001 before the official close of the Commission's records office at 4:00 p.m.

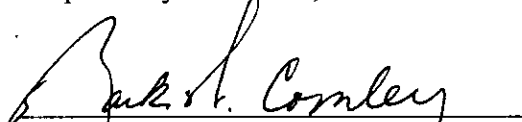
2. Accompanying this motion is the prepared direct testimony in this matter of Russell C. Widmar, Director of the Aviation Department for the City of Kansas City. Confirmation of several of the details set forth in Mr. Widmar's testimony could not be completed by the 4:00 p.m. filing time and as a consequence, the filing of his direct testimony is out of time.

3. The City and the Aviation Department attempted in earnest to meet the deadline for filing of this testimony. This motion is being filed before 8:30 a.m. on December 7, 2001 and the testimony of Mr. Widmar is being transmitted to the parties electronically as well as by facsimile transmission and first class mail. Failing to achieve the deadline was not for purposes of delay but rather due to circumstances which the City asks the Commission to deem excusable.

WHEREFORE, the City respectfully requests that the Commission accept for filing one day

out of time the prepared direct testimony of City witness, Russell C. Widmar.

Respectfully submitted,



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Attorneys for City of Kansas City, Missouri

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, on this 7th day of December, 2001, to:

Stuart W. Conrad
Finnegan, Conrad & Peterson
1209 Penntower Office Center
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Kansas City, MO 64111

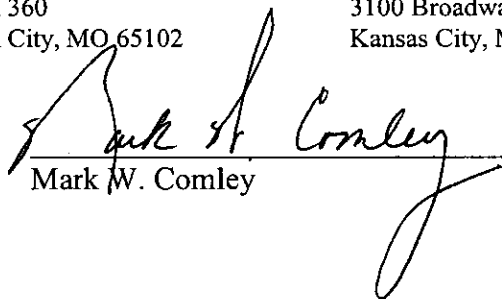
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