

BEFORE THE PUBLIC SERVICE COMMISSION OF MISSOURI

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In the Matter of the Tariff Filing of	)	Docket No. ER-2001-672
Utilicorp United Inc. d/b/a	)	
Missouri Public Service Company for	)	SUPPORT OF STAFF'S MOTIONS
authority to increase its charges for	)	TO CONSOLIDATE AND FOR LEAVE
electric service in its Missouri	)	TO FILE SUPPLEMENTAL DIRECT
service area	)	TESTIMONY OF STEVE M.
	)	TRAXLER

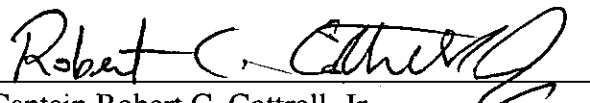
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Now comes the United States Executive Agencies ("USEA"), by and through its counsel, Captain Robert C. Cottrell, Jr., respectfully requests that the Commission grant Staff's Motion to Consolidate. For all the reasons stated in USEA's motion to intervene in Docket No. EC-2002-265, USEA expresses its support for Staff's Motion to Consolidate this case with the aforementioned docket and asks this Commission to grant Staff's motion.

In addition, USEA respectfully asserts its support for Staff's Motion for Leave to File Supplemental Direct Testimony of Staff Witness Steve M. Traxler. This testimony provides valuable information relevant to both Case No. EC-2002-265 and Case No. ER-2001-672. USEA welcomes this information and has found it to be beneficial to our involvement in these dockets.

Respectfully submitted,

UNITED STATES EXECUTIVE AGENCIES

  
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Captain Robert C. Cottrell, Jr.  
Utility Litigation Team  
139 Barnes Drive, Suite 1  
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Dated: 02 Jan 02

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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In the Matter of the Tariff Filing of	)	Docket No. ER-2001-672
Utilicorp United Inc. d/b/a	)	
Missouri Public Service Company for	)	CERTIFICATE OF SERVICE
authority to increase it charges for	)	
electric service in its Missouri	)	
service area	)	

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I HEREBY CERTIFY that true and correct copies of the U.S. Executive Agencies' Motion to Intervene were mailed to each of the following this 2<sup>nd</sup> day of January 2002:

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Dated: 02 Jan 02