

Commissioners

SHEILA LUMPE Chair

CONNIE MURRAY

KELVIN L. SIMMONS

STEVE GAW

Missouri Public Service Commission

POST OFFICE BOX 360 JEFFERSON CITY, MISSOURI 65102 573-751-3234 573-751-1847 (Fax Number) http://www.psc.state.mo.us

June 1, 2001

WESS A. HENDERSON Director, Utility Operations

ROBERT SCHALLENBERG Director, Utility Services

DONNA M. KOLILIS Director, Administration

DALE HARDY ROBERTS Secretary/Chief Regulatory Law Judge

> DANA K. JOYCE General Counsel

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

RE: Case No. GO-2001-249

Dear Mr. Roberts:

FILED³
JUN 0 1 2001

Service Commission

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a STAFF'S DISCOVERY STATUS REPORT.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Robert V. Franson

Assistant General Counsel

(573) 751-6651

(573) 751-9285 (Fax)

rfranson@mail.state.mo.us

RVF:ccl Enclosure

cc: Counsel of Record

FILED³
JUN 0 1 2001
Missouri Public

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of an Investigation into various)	
issues related to UtiliCorp United Incorporated's)	Case No. GO-2001-249
Gas Supply Services Department)	

STAFF'S DISCOVERY STATUS REPORT

COMES NOW the Staff of the Missouri Public Service Commission ("the Staff") and for its Status Report Case states:

- 1. UtiliCorp United Incorporated ("UtiliCorp") is a Missouri regulated electrical and gas corporation, doing business as a Missouri Public Service Company. §386.250, §393.140, RSMo 2000.
- 2. On October 16, 2000, the Staff asked the Commission to establish a case in order to investigate certain allegations of impropriety contained in an anonymous letter received by the Chair of the Commission on September 9, 2000.
- 3. The anonymous letter raised allegations of impropriety concerning the operation of UtiliCorp's Gas Supply Services Department in Missouri and other states.
- 4. On October 31, 2000, UtiliCorp responded by denying the allegations and supported Staff's Motion to Open a Case.
 - 5. The Commission issued its Order establishing its case on November 9, 2000.
- 6. On March 13, 2001, a prehearing conference was held. The Commission issued its Order Adopting Procedural Schedule on April 6, 2001.

- 7. Discovery has proceeded between the parties. Staff and OPC attended a Technical Conference held in Omaha, NE with UtiliCorp in December, 2000. Staff has submitted three sets of data requests to UtiliCorp. UtiliCorp has responded to all of these Data Requests. However, Staff is still reviewing the third set of Data Requests and may need some follow-up clarification on a few matters. OPC has submitted data requests, received responses and is still reviewing the responses.
- 8. The parties met on May 29, 2001 and discussed a final series of discovery matters. This will possibly involve one more on site visit.
- 9. Staff will be filing a Motion to Extend the Discovery Deadline no later than June 8, 2001.

WHEREFORE, the Staff respectfully submits this Discovery Status Report.

Respectfully submitted,

DANA K. JOYCE General Counsel

Robert V. Fránson

Assistant General Counsel Missouri Bar No. 34643

Attorney for the Staff of the Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-6651 (Telephone)

(573) 751-9285 (Fax)

e-mail: rfranson@mail.state.mo.us

Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 1st day of June, 2001.

Robert V. Francing

Service List for Case No. GO-2001-249 June 1, 2001 (ccl)

Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102 Dean L. Cooper Brydon, Swearengen & England P.C. P.O. Box 456 Jefferson City, MO 65102-0456