



Commissioners

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June 5, 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

FILED³

JUN 05 2001

Missouri Public
Service Commission

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:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **JOINT MOTION TO EXTEND DISCOVERY AND STAFF REPORT DEADLINES.**

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

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

JUN 05 2001

Missouri Public
Service Commission

In the matter of an Investigation into)
various issues related to UtiliCorp United)
Incorporated's Gas Supply Services)
Department)

Case No. GO-2001-249

JOINT MOTION TO EXTEND DISCOVERY AND STAFF REPORT DEADLINES

COMES NOW the Staff of the Missouri Public Service Commission ("the Staff"), UtiliCorp United Inc. ("UtiliCorp"), and Office of the Public Counsel ("OPC") and respectfully state:

1. UtiliCorp is a Missouri regulated electric, gas and heating corporation, doing business as Missouri Public Service Company and St. Joseph Light & Power. §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 or more on-site visits to Omaha by Staff personnel.

9. On June 1, 2001, Staff filed its Discovery Status Report.

10. The parties have met, discussed Discovery, and believe that it would be beneficial to finalize Discovery and consultations among the parties beyond the initial dates set forth in the Commission Order. The extension would provide time for any other necessary Discovery, analysis of the voluminous materials already received and consultation among the parties regarding the matters raised in this case.

WHEREFORE, the Staff, UtiliCorp and OPC respectfully request that Discovery continue in this case and that the deadline for Staff's Report be extended to August 31, 2001.

Respectfully submitted,

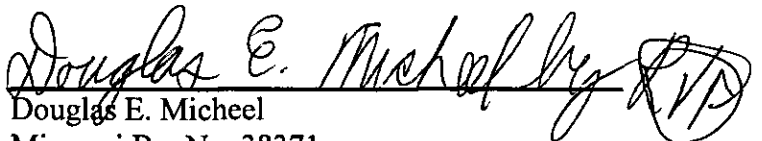
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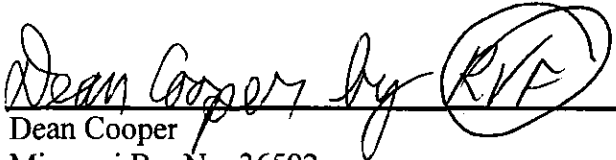
**ATTORNEY FOR THE STAFF OF THE
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PUBLIC COUNSEL**



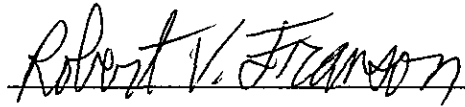
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**ATTORNEY FOR UTILICORP UNITED
INCORPORATED**

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 5th day of June 2001.



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

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