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August 8, 2001

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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

FILED

AUG 8 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 **STAFF'S REQUEST FOR PARTIAL EXTENSION OF REPORT FILING DATE.**

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
Associate General Counsel
(573) 751-6651
(573) 751-9285 (Fax)
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RVF:ccl
Enclosure
cc: Counsel of Record

FILED

AUG 8 2001

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

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 REQUEST FOR PARTIAL EXTENSION OF REPORT FILING DATE

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 concerning the operation of UtiliCorp's Gas Supply Services Department in Missouri and other states contained in an anonymous letter received by the Chair of the Commission on September 9, 2000.
3. The Commission issued its Order establishing its case on November 9, 2000.
4. The Commission issued its Order Adopting Procedural Schedule on April 6, 2001.
5. On June 14, 2001, the Commission granted a Joint Motion to Extend Discovery. The Commission Order extended Discovery and the filing of the Staff Report to August 31, 2001 and extended the Responses of Staff's Report by All Parties to September 28, 2001.

6. Staff has recently become aware of matters that compel Staff to seek a partial extension of the August 31, 2001, Staff Report. Staff has recently received information regarding events occurring in Minnesota's Investigation that may have some significant bearing on the subject of puts and calls that will be an integral part of Staff's Report. Staff has just, during the week of August 6-10, 2001, arranged to see certain documents that had to be viewed on the premises of UtiliCorp. Staff has also returned to Omaha on two separate occasions since June 14, 2001. Staff also believes that this new information may have some impact on its Staff Recommendation in GR-99-435.

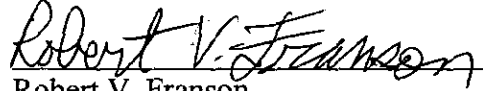
7. Staff proposes to file all of its Report on August 31, 2001, except for the final part dealing with puts and calls and the final conclusion, as previously ordered by the Commission. Staff also proposes that discovery dealing with puts and calls and the Staff Report on puts and calls be extended to September 30, 2001. Accordingly, Staff also proposes that the deadline for all other parties to respond to Staff's Report be extended to October 29, 2001.

8. The Office of Public Counsel supports this Request.

WHEREFORE, the Staff respectfully requests this Partial Extension of Staff Report and Discovery.

Respectfully submitted,

DANA K. JOYCE
General Counsel

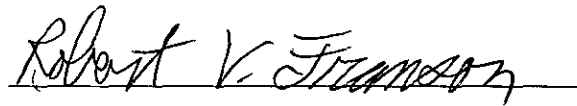


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Certificate of Service

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 8th day of August 2001.



**Service List for
Case No. GO-2001-249
August 7, 2001 (cc)**

**Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102**

**Dean L. Cooper
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