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August 16, 2001

Mr. Dale Hardy Roberts
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: UtiliCorp United Inc. - Case No. GO-2001-249

FILED²
AUG 16 2001
Missouri Public
Service Commission

Dear Mr. Roberts:

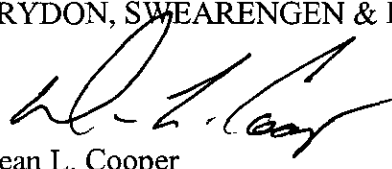
Enclosed for filing in the above-referenced proceeding please find an original and eight copies of UtiliCorp's Response to Staff's Request for Partial Extension. Please stamp the enclosed extra copy of each "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:


Dean L. Cooper

DLC/rhg
Enclosures

cc: Mr. Robert Franson, General Counsel
Mr. Doug Micheel, OPC

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
AUG 16 2001

Missouri Public
Service Commission

In the Matter of an Investigation into various)
issues related to UtiliCorp United Inc.'s)
Gas Supply Services Department.)

Case No. GO-2001-249

UTILICORP'S RESPONSE TO
STAFF'S REQUEST FOR PARTIAL EXTENSION

COMES NOW UtiliCorp United Inc. ("UtiliCorp" or "Company") d/b/a Missouri Public Service, and, in response to the Missouri Public Service Commission ("Commission") Staff's ("Staff") Request for Partial Extension of Report Filing Date, states to the Commission as follows:

1. On October 16, 2000, the Staff filed its Motion to Open Case ("Motion") which led to the Commission's Order Establishing Case and Directing Notice issued November 9, 2000.

The Commission thereafter issued its Order Setting Prehearing Conference and Requiring Filing of Procedural Schedule and a prehearing conference was held March 13, 2001. The parties filed their Joint Proposed Procedural Schedule on March 20, in compliance with the Commission's order.

2. On April 6, 2001, the Commission issued its Order Adopting Procedural Schedule wherein it adopted the procedural schedule proposed by the parties as follows:

Discovery Cut-off and Staff Discovery Status Report	June 1, 2001
Staff Report	June 21, 2001
Responses to Staff's Report	July 11, 2001

3. On June 5, 2001, having decided that it had not yet finalized its discovery, the Staff proposed, and UtiliCorp joined in, a Joint Motion to Extend Discovery and Staff Report Deadlines. The Commission granted this motion and issued its Order Directing Filing wherein it called for a discovery cutoff and Staff Report to be filed on August 31, 2001. The Staff, on August 8, 2001, has since filed its Request for Partial Extension of Report Filing Date wherein it requests that the

Commission extend the date for the filing of that part of its Staff Report which addresses puts and calls until September 30, 2001.

4. While UtiliCorp does not object to the Staff having an additional thirty days for the filing of this portion of its report, UtiliCorp hopes that this will be the final extension and this matter can thereafter begin to progress toward a conclusion. Additionally, UtiliCorp is somewhat confused by the Staff's indication that the extension is needed because it recently received information regarding events in a Minnesota investigation that "may be" significant.

5. This statement is curious because the fundamental differences between the systems and entities that serve the Minnesota and Missouri service territories result in very little overlap between UtiliCorp's purchasing practices in the two states.

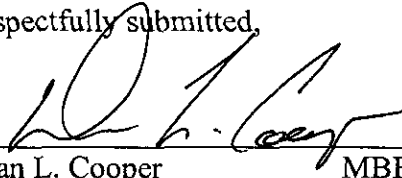
6. Interstate transportation service for Minnesota is provided by the Northern Natural Gas Pipeline ("NNG"), while Missouri is served through two different interstate pipelines – Panhandle Eastern Pipeline ("Panhandle") and Williams Gas Pipeline Central ("Williams"). These pipeline differences create a variation in potential suppliers. The pipelines also vary in operational requirements. The most significant of these is the difference in balancing requirements. NNG and Panhandle are daily balancing pipelines and Williams is a monthly balancing pipeline. These balancing requirements result in different purchasing strategies, as well as differences in how to reconstruct what may have taken place in the past.

7. There is also a significant disparity between the systems in the storage volume available to UtiliCorp in each state. The fundamental difference in geographic location also contributes to this situation. Minnesota and Missouri are separated by enough distance that weather patterns differ greatly.

8. This having been said, UtiliCorp would like to reconfirm its commitment to working with the Staff to reach a resolution of this matter and to ensure that UtiliCorp's customers have not been adversely impacted by any of its purchasing practices.

WHEREFORE, UtiliCorp does not object to a grant of the Staff's Request for Partial Extension of Report Filing Date.

Respectfully submitted,



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ATTORNEYS FOR UTILICORP UNITED INC.
D/B/A MISSOURI PUBLIC SERVICE

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was either hand-delivered or mailed, U.S. Mail, postage prepaid, on the 16th day of August, 2001, to: Robert V. Franson, Public Service Commission, Governor Office Building, Jefferson City, Mo 65101; and, Douglas Micheel, Office of the Public Counsel, 6th Floor, Governor Office Building, Jefferson City, Mo 65101.

