

FILED<sup>3</sup>

JUN 14 2001

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

Missouri Public  
Service Commission

In the matter of Missouri Gas Ener- )  
gy of Kansas City, Missouri re- )  
quested authority to file a tariff ) Case No. GR-2001-292  
reflecting a change in rates for )  
its Missouri customers )

MIDWEST GAS USERS' ASSOCIATION,  
CITY OF RIVERSIDE AND JACKSON COUNTY'S  
RESPONSE TO JOINT MOTION  
FOR PARTIAL SUSPENSION OF PROCEDURAL SCHEDULE


On June 7, 2001 Staff, Public Counsel and MGE filed a "Motion of the Staff, Public Counsel and Missouri Gas Energy for Partial Suspension of Procedural Schedule" (Motion). No motion to shorten time for response was served upon Midwest Gas Users' Association (Midwest), City of Riverside (Riverside) and Jackson County (collectively "Indicated Intervenors"). Thus Indicated Intervenors timely respond to the Motion as follows:

1. Indicated Intervenors are glad that these three parties have continued to have settlement discussions following the prehearing conference and have, apparently, reached "agreement in principle which they believe will resolve all of the issues in this proceeding." Unfortunately, these three parties have not chosen to involve Midwest, Riverside or Jackson County in those post-prehearing conference negotiations and we neither share their belief nor understand the factual basis of their apparent agreement.

2. Those parties are free to devote such time as they desire to drafting stipulations or to preparing for hearing on the issues that they choose. Since we have not been consulted with respect to these matters, we are unable to respond to any proposed settlements until they are filed. Given that we have not seen any such filings, any non-unanimous motion to dispense with procedural dates, or to limit issues in this proceeding is entirely premature and should be denied. Even if such a nonunanimous settlement is filed, unless accepted by all parties in the case, it is no more than a change of position by those parties on issues that remain fully in this case.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

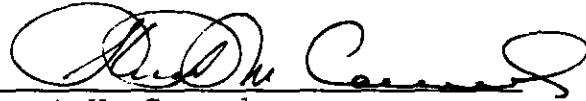
  
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ATTORNEYS FOR MIDWEST GAS USERS'  
ASSOCIATION, CITY OF RIVERSIDE AND  
JACKSON COUNTY

June 14, 2001

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by hand, electronic means or United States mail prepaid to all parties by their attorneys of record as disclosed by the pleadings and orders herein.

A handwritten signature in cursive script, appearing to read "Stuart W. Conrad", written over a horizontal line.

Stuart W. Conrad

Dated: June 14, 2001