ATTORNEYS AND COUNSELORS AT LAW

1209 PENNTOWER OFFICE CENTER

3100 BROADWAY

(816) 753-1122

KANSAS CITY, MISSOURI 64111

TELECOPIER (816) 756-0373

JEREMIAH PINNEGAN, P.C. STUART W. CONRAD C. EDWARD PETERSON*

*also admitted in KANSAS AND MASSACHUSETTS

June 18, 2001

VIA FEDERAL EXPRESS

Mr. Dale H. Roberts, Secretary Missouri Public Service Commission 200 Madison Street, Suite 100 Jefferson City, MO 65101

Re:

Missouri Gas Energy Case No. GR-2001-292 FILED JUN 1 9 2001

Missouri Public Service Commission

Dear Mr. Roberts:

On Tuesday, June 12, 2001, several parties to this case, not including Intervenors, Jackson County and City of Riverside, filed a document entitled "First Revised Stipulation and Agreement." Although no formal notice was included so stating, we presume that the document was intended to be filed under 4 CSR 240-2.115.

This letter will serve as the notice stated in 4 CSR 240-2.115(2) that Intervenors, Jackson County and City of Riverside, oppose this stipulation, and request a hearing on all issues comprehended by it under the provisions of the Commission's rule and pursuant to the Missouri Supreme Court's ruling in State ex rel. Fischer v. Public Service Commission, 645 S.W. 2d 39 (Mo. App. 1982), cert. denied, 464 U.S. 819, 104 S.Ct. 81, 78 L.Ed. 2d 91 (1983) and the rulings in State ex rel. Arkansas Power & Light Company v. Public Service Commission, 736 S.W.2d 457, 460 (Mo. App., W.D. 1987).

By

Very truly yours,

FINNEGAN, CONRAD & PETERSON, L.C.

Jeremiah D. Finnegan

JDF:crb

All Parties F:\DOCS\JDF\48430.1