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June 12, 2001

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

FILED³
JUN 12 2001
**Missouri Public
Service Commission**

RE: UtiliCorp United - Case No. GT-2001-329

Dear Mr. Roberts:

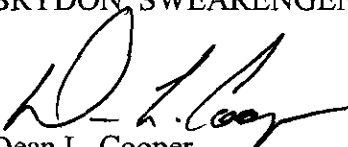
Enclosed for filing in the above-referenced proceeding please find an original and eight copies of UtiliCorp's Motion for Leave to Withdraw as Intervenor. Please stamp the enclosed extra copy "filed" and return same to me.

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: Office of the Public Counsel
Mr. David Meyer, PSC
Mr. Doug Micheel, OPC
Mr. Michael Pendergast
Ms. Diana Vuylsteke
Mr. Jim Fischer/Mr. Larry Dority
Mr. Rob Hack
Mr. Thomas Byrne

JUN 12 2001

Missouri Public
Service Commission

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Laclede Gas Company's)
Tariff Filing to Implement an) Case No. GT-2001-329
Experimental Fixed Price Plan and Other)
Modifications to Its Gas Supply Incentive Plan.)

UTILICORP'S MOTION FOR LEAVE TO WITHDRAW AS INTERVENOR

Comes now UtiliCorp United Inc. ("UtiliCorp") d/b/a Missouri Public Service ("MPS") and d/b/a St. Joseph Light & Power ("SJLP"), and, for its motion for leave to withdraw as an intervenor, states as follows to the Missouri Public Service Commission ("Commission"):

1. This proceeding was established to address Laclede Gas Company's ("Laclede") Gas Supply Incentive Plan, and proposed modifications thereto. On April 18, 2001, the Staff filed a motion requesting that it be permitted to use certain information pertaining to the cost of gas and volumes of gas provided by Missouri local distribution companies on a confidential basis.

2. On April 24, 2001, UtiliCorp filed with the Commission its Application to Intervene and Response to Staff Motion. UtiliCorp sought to intervene “in order to both respond to the Staff Motion and to monitor any future proposals that may arise to utilize this information.” Additionally, in the circumstance that the Commission agreed to allow the information to be utilized as proposed by Staff, UtiliCorp sought “status as an intervenor in order to ensure that its gas supply information is adequately protected from improper disclosure and to ensure that such information and UtiliCorp’s gas supply operations are placed in appropriate perspective during the course of any Commission review.”

3. On May 3, 2001, the Commission used its Order Permitting Use of Certain Information and Order Granting Intervention and Revising Procedural Schedule which, among other

things, granted Staff's Motion for Order Permitting Use of Information, as well as UtiliCorp's application to intervene. The Staff later filed its testimony using the confidential information obtained from Missouri local distribution companies.

4. On May 15, 2001, Staff filed a motion asking to withdraw the confidential information. In response, the Commission issued its Order Regarding Staff Motion to Withdraw Highly Confidential Schedule and Substitute Schedule and Testimony wherein it authorized Staff to withdraw the disputed information. Staff filed its substitute pages and schedule on June 4, 2001, eliminating the confidential information received from other local distribution companies.

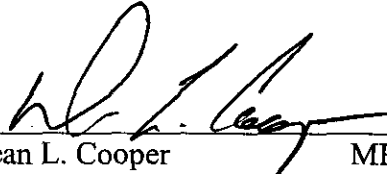
5. As stated in its Application to Intervene, UtiliCorp's interest in this proceeding was created by the Staff's Motion for Order Permitting Use of Information because the Staff was proposing to use in this proceeding information and data concerning the cost of natural gas and the volumes of natural gas that had been provided by UtiliCorp on a confidential basis.

6. As a result of the subsequent withdrawal of this information, UtiliCorp no longer has a direct interest in this case. Therefore, UtiliCorp seeks the Commission's leave to withdraw as an intervenor.

WHEREFORE, UtiliCorp respectfully requests the Commission issue an order:

- a) granting its Motion For Leave to Withdraw as Intervenor; and,
- b) granting such further relief as may be reasonable, just and consistent with the relief requested herein.

Respectfully submitted,



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ATTORNEYS FOR UTILICORP UNITED INC.
D/B/A MISSOURI PUBLIC SERVICE
D/B/A ST. JOSEPH LIGHT & POWER

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 this 12th day of June, 2001, to the following:

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