



Missouri Public Service Commission

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March 7, 2000

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DANA K. JOYCE
General Counsel

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED 3
MAR 07 2000

Missouri Public
Service Commission

RE: Case No. EM-2000-506

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of the STAFF'S MOTION FOR ADDITIONAL TIME TO FILE RESPONSE TO THE COMMISSION'S ORDER DIRECTING STAFF TO INFORM THE COMMISSION WHETHER STAFF CAN INVESTIGATE AND FILE A STAFF REPORT REGARDING THE APPLICATION BY MAY 9, 2000.

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,

[Handwritten signature of Nathan Williams]

Nathan Williams
Assistant General Counsel
(573) 751-8702
(573) 751-9285 (Fax)

NW/lb
Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

MAR 07 2000

Missouri Public
Service Commission

In the Matter of the Application of)
UtiliCorp United Inc. for Authority to)
Acquire, Indirectly, the Capital Stock of)
860023 Alberta Ltd., and to Take all Other)
Actions Reasonably Necessary to)
Effectuate Said Transactions)
)

Case No. EM-2000-506

**STAFF'S MOTION FOR ADDITIONAL TIME TO FILE RESPONSE
TO THE COMMISSION'S ORDER DIRECTING STAFF TO INFORM
THE COMMISSION WHETHER STAFF CAN INVESTIGATE AND FILE
A STAFF REPORT REGARDING THE APPLICATION BY MAY 9, 2000**

Comes now the Staff of the Missouri Public Service Commission (Staff), by counsel, and for its Motion for Additional Time to File Response to the Commission's Order Directing Staff to Inform the Commission Whether Staff Can Investigate and File a Staff Report Regarding the Application by May 9, 2000, states as follows:

1. On February 18, 2000, UtiliCorp United Inc. (UtiliCorp) filed its Application for Authority to acquire from TransAlta Corporation (TransAlta) its electric distribution and retail business located in Canada.
2. In its Application UtiliCorp stated that it is a Delaware Corporation subject to the jurisdiction of the Commission and that TransAlta is a Canadian Corporation.
3. UtiliCorp also stated in its Application how it planned to structure the acquisition and requested that the Commission issue its order regarding UtiliCorp's Application no later than June 1, 2000 with an effective date of no later than June 13, 2000.

4. In response to UtiliCorp's foregoing requests, the Commission, on March 1, 2000, issued its order to Staff directing Staff to "file a pleading no later than 3:00 p.m. on March 7, 2000, stating whether or not it will be able to complete its investigation of the proposed transaction and be able to file its report no later than May 9, 2000."

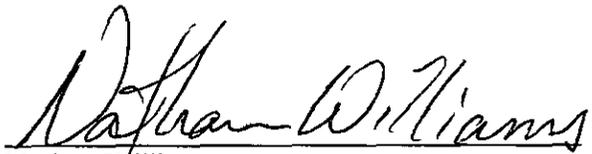
5. Staff's coordinator for this case is unavailable at least until Thursday, March 9, 2000. Additionally, one of the other Staff persons assigned to rendering the determination the Commission has requested is presently serving on a jury in Jackson County, Missouri and is not expected to be available before late this week.

6. Staff has contacted the attorney representing UtiliCorp in this case and the Office of the Public Counsel, regarding Staff being granted an extension until Tuesday, March 14, 2000 to state whether or not it will be able to complete its investigation of the proposed transaction and be able to file its report no later than May 9, 2000, in response to the Commission's aforesaid Order. Neither object to such an extension.

WHEREFORE, the Staff respectfully moves the Commission to grant the Staff an extension until 3:00 p.m., Tuesday, March 14, 2000, to file a pleading stating whether or not it will be able to complete its investigation of UtiliCorp's proposed transaction and file its report by May 9, 2000, in response to the Commission's Order.

Respectfully submitted,

DANA K. JOYCE
General Counsel

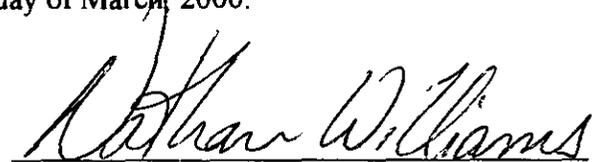


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Missouri Bar No. 35512

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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 7th day of March, 2000.



**Service List for
Case No. EM-2000-506
March 7, 2000**

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

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Brydon, Swearngen & England, PC
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