



Missouri Public Service Commission

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January 15, 2002

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FILED

JAN 15 2002

Missouri Public
Service Commission

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

RE: Case No. ER-2001-672 – In the matter of the Tariff Filing of Missouri Public Service (MPS), a Division of UtiliCorp United, Inc., to Implement a General Rate Increase for Retail Electric Service Provided to Customers in the Missouri Service Area of MPS.

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and the appropriate number of conformed copies of the **STAFF'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL DIRECT TESTIMONY (HC AND NP VERSIONS)**.

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,

Nathan Williams
Associate General Counsel
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Enclosure

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

JAN 15 2002

Missouri Public
Service Commission

In the matter of the Tariff Filing of Missouri)
Public Service (MPS), a Division of UtiliCorp)
United, Inc., to Implement a General Rate Increase)
for Retail Electric Service Provided to Customers)
in the Missouri Service Area of MPS.)

Case No. ER-2001-672

**STAFF'S MOTION FOR LEAVE TO FILE
SUPPLEMENTAL DIRECT TESTIMONY**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Motion for Leave to File Supplemental Direct Testimony states:

1. Staff, as directed by the Commission in its Order amending the original procedural schedule, filed its direct testimony in this case on December 6, 2001.
2. In the direct testimony of Staff witnesses Mark L. Oligschlaeger and Cary G. Featherstone prefiled in this case, they stated that they were unable at the time they prepared their direct testimony to present the Staff's position on rate treatment of the costs of the purchase power agreement between Missouri Public Service and Merchant Energy Partners—Pleasant Hill (MEPPH) because the Staff had been unable to obtain certain information from UtiliCorp that the Staff considered pertinent to evaluating that purchase power agreement.
3. While the Staff has still not received information pertinent to completely defining and developing its position, the Staff has sufficient information at this time to take a position on the rate treatment of the costs of the purchased power agreement between Missouri Public Service and Merchant Energy Partners—Pleasant Hill. The purpose of the Staff's supplemental direct testimony is to set forth this position.

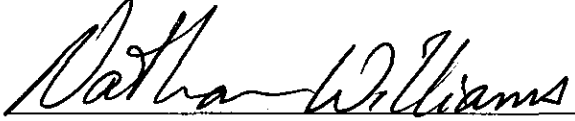
4. The Staff has not waited until this time to file the supplemental direct testimony in order to disadvantage or inconvenience Missouri Public Service, the other parties or the Commission. After consulting with Missouri Public Service, which was not able to approve the dates the Staff proposes before the Staff filed this motion, the Staff suggests that the Commission grant to Missouri Public Service and the other parties until January 23, 2002 to file supplemental rebuttal and the Staff until January 29, 2002 to file supplemental surrebuttal. The Commission could schedule this issue to be heard during the last week of the scheduled hearings.

5. Submitted herewith for filing is the Supplemental Direct Testimony of Staff Witness Mark L. Oligschlaeger, both the original which contains highly confidential information and as redacted to eliminate that highly confidential information, in which he sets out the Staff's position on rate treatment of the costs of the purchased power agreement between Missouri Public Service and Merchant Energy Partners—Pleasant Hill.

WHEREFORE the Staff requests the Commission for leave to file in this case the Supplemental Direct Testimony of Staff Witness Mark L. Oligschlaeger, both the original containing material designated highly confidential and as redacted, and establish a schedule for the filing of rebuttal and surrebuttal testimony with regard thereto as suggested above.

Respectfully submitted,

DANA K. JOYCE
General Counsel

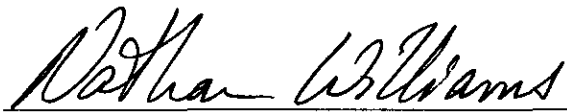


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Certificate of Service

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 15th day of January 2002.



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Case No. ER-2001-672
Verified: January 7, 2002, (cgo)

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