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## Missouri Public Service Commission

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November 21, 2001

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Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**FILED<sup>2</sup>**  
NOV 21 2001  
Missouri Public  
Service Commission

**RE: Case No. GR-2001-394**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION FOR EXTENSION OF TIME AND FOR EXPEDITED TREATMENT.**

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,

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DLF:ccl  
Enclosure  
cc: Counsel of Record

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

**FILED<sup>2</sup>**  
NOV 21 2001  
Missouri Public  
Service Commission

In the Matter of Greeley Gas Company's )  
Purchased Gas Adjustment Factors to be )  
Reviewed in its 2000-2001 Actual Cost )  
Adjustment )

Case No. GR-2001-394

**MOTION FOR EXTENSION OF TIME AND FOR  
EXPEDITED TREATMENT**

In support of its Motion for Extension of Time and for Expedited Treatment, the Staff respectfully states:

1. The Commission established this case for the purpose of reviewing the natural gas costs of Greeley Gas Company for the 2000-2001 Actual Cost Adjustment ("ACA") period. Following the extraordinarily cold months of November and December 2000, and the record high prices of natural gas, the Commission set this case on an accelerated procedural schedule.

2. The Commission ordered that Staff file its memorandum and recommendation in this case on December 4, 2001.

3. Staff hired a consultant, Mr. John Herbert, to assist in evaluating the ACA cases, and in particular the hedging practices of Missouri local distribution companies ("LDCs"). In proposing procedural schedules to the Commission, the Staff had anticipated that the consulting contract would be awarded by June 1, 2001, and that Staff would be able to promptly provide all the data that Mr. Herbert might need, in the format he would need.

4. Award of the contract was delayed in order to permit vendors to analyze and prepare proposals either on a turn-key basis (providing the entire ACA audit), or on a more limited basis (providing only hedging review services). This amendment to the RFP delayed

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award of the contract, and other procedural matters such as obtaining non-disclosure statements resulted in additional delays to Mr. Herbert starting his work under the contract.

5. Further complicating and delaying the process, the LDCs provided data to Staff in a variety of electronic formats. Staff has had to rework the formatting of this data in order to provide Mr. Herbert with a consistent database from which to complete his work.

6. Staff, therefore, respectfully requests that the Commission grant an extension of time until January 18, 2002, for Staff to file its memorandum and recommendation in this case.

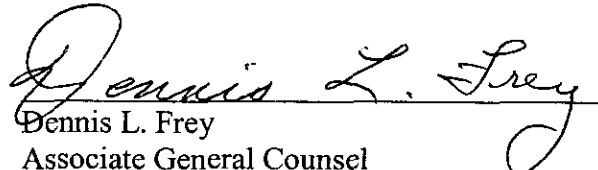
7. Because of the press of time on the Procurement Analysis Department Staff, the Staff respectfully requests that the Commission address this motion on an expedited basis.

8. This filing was made promptly after it was discovered that additional time would be required to complete the gas cost audit and analysis in this case.

WHEREFORE, the Staff respectfully requests that the Commission consider this motion on an expedited basis, and grant Staff until January 18, 2002 to file its recommendation in this case. Granting this motion will allow Staff and Staff's consultant the time to complete their work, and should have no adverse impact on consumers.

Respectfully submitted,

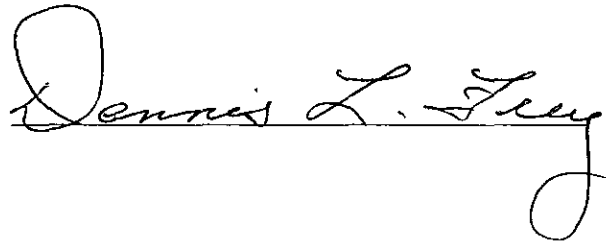
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### **Certificate of Service**

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 21st day of November 2001.



**Service List for  
Case No. GR-2001-394  
Revised: November 21, 2001 (ccl)**

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