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March 20, 2002

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ROBERT SCHALLENBERG
Director, Utility Services
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Director, Administration
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Secretary/Chief Regulatory Law Judge
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

FILED³

MAR 20 2002

Missouri Public
Service Commission

RE: Case No. GR-2001-397

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **STAFF MOTION TO MODIFY PROCEDURAL SCHEDULE**.

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,

Dennis L. Frey
Associate General Counsel
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DLF:ccl
Enclosure
cc: Counsel of Record

FILED³

MAR 20 2002

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the matter of United Cities Gas)
Company's Purchased Gas Adjustment)
Tariff Revisions to be Reviewed in Its)
2000-2001 Actual Cost Adjustment.)

Case No. GR-2001-397

STAFF MOTION TO MODIFY PROCEDURAL SCHEDULE

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and respectfully states as follows:

1. On April 2, 2001, the Commission issued its Order Adopting Procedural Schedule in the above-styled case.

2. All parties have complied with the procedural schedule prior to the March 20, 2002 filing date of this Motion.

3. Substantial changes have occurred which affect Staff's ability to timely comply with the remainder of the procedural schedules in the above-styled cases. These changes include: departure of experienced Staff who were involved in Actual Cost Adjustment cases; necessary training time for new Staff; a delay in the contract with a consultant on hedging and in providing information to that consultant; Staff time for multiple priorities including working on and with EFIS preparation, rate cases, testimony and hearings for other ACA cases, meetings and hearings on incentive plans, responding to Company Data Requests, as well as participation in Commission task forces.

4. All of these factors have combined to make it extremely difficult for Staff to complete audits within the existing procedural schedule, and for this reason Staff is requesting a revised Procedural Schedule.

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5. Staff proposes the following modifications to the existing Procedural Schedule:

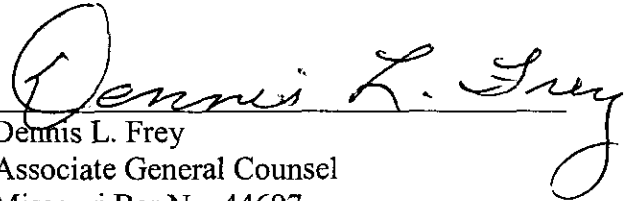
Staff Recommendation	August 29, 2002
Company Response	October 25, 2002
Direct Testimony (all parties)	December 13, 2002
Rebuttal Testimony (all parties)	January 24, 2003
Issues List	February 21, 2003
Surrebuttal Testimony	February 28, 2003
Position Statements	March 7, 2003
Hearing	March 18-20, 2003

6. Staff has consulted with Counsel for United Cities Gas Company and with the Office of the Public Counsel. Neither party has any objection to this request.

WHEREFORE, Staff respectfully requests that the Commission issue an order modifying the remainder of the Procedural Schedule consistent with Staff's recommendations.

Respectfully submitted,

DANA K. JOYCE
General Counsel


Dennis L. Frey
Associate General Counsel
Missouri Bar No. 44697

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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 20th day of March 2002.

Dennis L. Frey

Service List for
Case No. GR-2001-397
Revised: March 20, 2002 (ccl)

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