

**FINNEGAN, CONRAD & PETERSON, L.C.**

ATTORNEYS AND COUNSELORS AT LAW

1209 PENNTOWER OFFICE CENTER  
3100 BROADWAY  
KANSAS CITY, MISSOURI 64111

(816) 753-1122  
TELECOPIER (816) 756-0373

JEREMIAH FINNEGAN, P.C.  
STUART W. CONRAD  
C. EDWARD PETERSON\*

\*ALSO ADMITTED IN  
KANSAS AND MASSACHUSETTS

February 21, 2001

**FILED<sup>3</sup>**

FEB 22 2001

Missouri Public  
Service Commission

**Via Overnight Delivery**

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

**RE: Case No. GW-2001-398  
Application to Serve on Natural Gas Commodity Price Task Force**

Dear Mr. Roberts:

Enclosed find an original and 9 copies of the Application to Serve on Natural Gas Commodity Price Task Force.

Please return the extra copy of the Application after affixing the file stamp thereto in the self-addressed stamped envelope I have also enclosed.

Very truly yours,

FINNEGAN, CONRAD & PETERSON, L.C.

By:

  
Jeremiah D. Finnegan

JDF:crb

enclosures

cc: Office of the Public Counsel  
Hon. Katheryn Shields, County Executive  
Jane McQueeney, County Counselor

**FILED**<sup>3</sup>  
FEB 22 2001

**STATE OF MISSOURI  
MISSOURI PUBLIC SERVICE COMMISSION**

Missouri Public  
Service Commission

**In the Matter of a Commission Inquiry into )  
Purchased Gas Cost Recovery. ) GW-2001-398  
)**

**APPLICATION TO SERVE ON  
NATURAL GAS COMMODITY PRICE TASK FORCE**

COMES NOW, Jeremiah D. Finnegan, Special Counsel for the County of Jackson, Missouri, and pursuant to the Order Establishing Case and Creating Task Force dated January 23, 2001, hereby makes application to serve on the Task Force and states:

1. Jeremiah D. Finnegan is an attorney at law with over 35 years experience in utility matters before this Commission and other regulatory bodies, including serving as this Commission's Assistant General Counsel (1965-1967) and General Counsel (1967-1973) and during such 35 year period, having been involved in numerous cases involving natural gas utilities in this state, other states and before federal regulatory agencies.

2. Correspondence, communications, orders and decisions in this matter should be addressed to:

Jeremiah D. Finnegan, Esq.  
FINNEGAN, CONRAD & PETERSON, L.C.  
1209 Penntower Office Center  
3100 Broadway  
Kansas City, Missouri 64111

3. That Jeremiah D. Finnegan has been appointed by the Hon. Katheryn Shields, County Executive of Jackson County, to serve as Special County Counsel for the purpose of participating on behalf of the County and its citizens in various utility matters before the

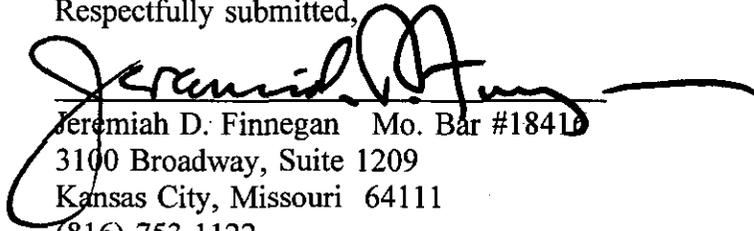
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Commission, including, *inter alia*, the instant case. That the County Executive has notified the Commission that she has placed the name of Jeremiah D. Finnegan in nomination to be the representative of Jackson County and its residents and businesses on such Task Force.

4. That Jackson County has been an active participant before the Commission in utility matters that impact on Jackson County, its residents and businesses. That it has an interest in any proceedings that impact on the price of natural gas to be paid by the County, its residents and businesses. That it believes that political subdivisions such as Jackson County, should be represented on the Task Force and that its nominee to the Task Force would bring an able and experienced voice to the table should the Commission appoint him to the Task Force.

WHEREFORE, for the foregoing reasons, Jeremiah D. Finnegan respectfully requests that the Commission grant his Application to Serve on the Natural Gas Commodity Task Force.

Respectfully submitted,

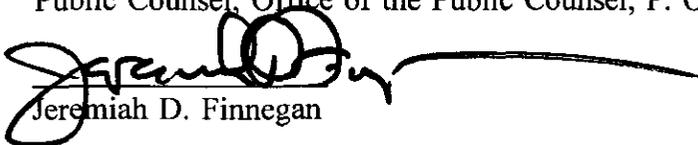


Jeremiah D. Finnegan Mo. Bar #18416  
3100 Broadway, Suite 1209  
Kansas City, Missouri 64111  
(816) 753-1122  
Facsimile (816)756-0373  
Internet: [jfinnegan@fcplaw.com](mailto:jfinnegan@fcplaw.com)

ATTORNEY FOR JACKSON COUNTY, MISSOURI

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this 21st day of February, 2001, served the foregoing pleading by U.S. mail, postage prepaid addressed to: Ms. Martha Hogerty, Public Counsel, Office of the Public Counsel, P. O. Box 7800, Jefferson City, MO 65102.



Jeremiah D. Finnegan