

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

In the Matter of the Tariff Filing of The Empire)
District Electric Company to Implement a General) Case No. ER-2006-0315
Rate Increase for Retail Electric Service Provided)
to Customers in its Missouri Service Area.)

MOTION FOR LEAVE TO LATE-FILE SCHEDULES TO TRUE-UP TESTIMONY

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

Pursuant to the ordered procedural schedule, on September 27, 2006, the Staff filed direct testimony in connection with the true-up phase of this proceeding. The four schedules associated with the True-Up Direct testimony of Staff witness Mark L. Oligschlaeger were inadvertently omitted from the filing. Attached hereto are Schedules 1 through 4 to Mr. Oligschlaeger's True-Up Direct testimony.

The Staff regrets and apologizes for the inadvertent omission, but believes that no party has been unduly prejudiced by the error.

WHEREFORE, the Staff respectfully requests leave to late-file Schedules 1 through 4 to the True-Up Direct testimony of Staff witness Mark L. Oligschlaeger.

Respectfully submitted,

/s/ Dennis L. Frey

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 28th day of September 2006.

/s/ Dennis L. Frey