

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

Joint Application of	)	
	)	
<b>Trigen-Kansas City Energy Corp.</b>	)	
	)	
and	)	Case No. HM-2004-0618
	)	
<b>Thermal North America, Inc.</b>	)	
	)	
For Grant of the Authority Necessary	)	
for the Transfer of Control, Sale of	)	
All Stock Currently Owned by	)	
Trigen Energy Corporation, Inc. to	)	
Thermal North America, Inc.	)	

**MOTION FOR TWO (2) BUSINESS DAY EXTENSION  
OF TIME TO FILE SURREBUTTAL TESTIMONY**

Pursuant to 4 CSR 240-2.050, Trigen-Kansas City Energy Corp. and Thermal North America, Inc. (collectively, the "Joint Applicants") hereby move for a two (2) business day extension of the time for the filing of the Surrebuttal Testimony herein, to and including November 8, 2004. In support of this Motion, Joint Applicants state as follows:

1. Surrebuttal Testimony is now due for filing on November 4, 2004.
2. Joint Applicants have not sought any prior extension of time for the filing of their Surrebuttal Testimony.
3. Joint Applicants are prosecuting a transfer of control case in Pennsylvania on a parallel track with this case. Further, Joint Applicants are working on a settlement proposal which may substantially narrow the issues presented to the Commission for

hearing. Due to the substantial time devoted to those and other matters, Joint Applicants have been unable to finalize their Surrebuttal Testimony.

4. Joint Applicants have contacted counsel for Commission Staff and notified them in advance of filing this motion.

5. Accordingly, good cause exists for granting an additional two (2) business days, through and including November 8, 2004, to file Surrebuttal Testimony.

WHEREFORE, Joint Applicants respectfully request that the Commission extend the time for the filing of Surrebuttal Testimony by two (2) business days, to and including November 8, 2004.

Respectfully submitted,

LATHROP & GAGE, L.C.

/s/ Paul S. DeFord

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***Attorneys for Trigen-Kansas City Energy Corp.  
and Thermal North America, Inc.***

Dated: November 4, 2004

**CERTIFICATE OF SERVICE**

I hereby certify that a correct copy of the foregoing Motion for Two (2) Business Day Extension of Time to File Surrebuttal Testimony was sent via U.S. Mail or electronic transmittal on this 4th day of November, 2004, to:

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