

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

In the Matter of an Investigation into Whether)
Ratepayers are being Held Harmless from the)
Taum Sauk Disaster)

Case No. ER-2008-0015

**STAFF MOTION FOR ADDITIONAL TIME TO REPLY
TO PUBLIC COUNSEL'S REPLY TO STAFF RESPONSE**

Comes now the Staff of the Missouri Public Service Commission (Staff) and requests additional time until Friday, September 28, 2007 to reply to the Public Counsel's Reply To Staff Response (Reply) filed by the Office of the Public Counsel (Public Counsel) on September 10, 2007. Contrary to the impression that the Staff apparently has imparted that the Staff has done nothing substantive in response to the Commission's May 22, 2007 Report And Order in Case No. ER-2007-0002 directing the Staff to investigate whether ratepayers are being held harmless from the Taum Sauk disaster, especially with regard to lost regulatory capacity sales, the Staff has been engaged in some such activity, although evidently not to the extent Public Counsel would prefer. The Staff requests leave to file a response beyond the ten (10) days allowed by 4 CSR 240-2.080(15) so that, among other things, it may more substantively address, even in a limited manner, the matters raised by Public Counsel in its request for a formal proceeding.

Wherefore, the Staff requests additional time until Friday, September 28, 2007 to reply to the Public Counsel's Reply To Staff Response.

Respectfully submitted,

/s/ Steven Dottheim

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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 24th day of September 2007.

/s/ Steven Dottheim