

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

In the matter of the application of Trigen-)
Kansas City Energy Corporation for a)
Certificate of Public Convenience and)
Necessity authorizing it to construct, install,) Case No. HA-2006-0294
own, operate, control, manage and maintain)
a steam heat distribution system to provide)
steam heat service in Kansas City, Missouri,)
as an expansion of its existing certified area.)

**JOINT MOTION FOR EXPEDITED PROCEDURAL SCHEDULE
AND OTHER PROCEDURAL MATTERS**

COME NOW the Staff of the Missouri Public Service Commission (Staff):

1. On January 10, 2006, Trigen filed its Application seeking to expand its certificated service area for the provision of regulated steam heating service in downtown Kansas City, Jackson County, Missouri.

2. Staff is filing this Joint Motion on behalf of all of the Parties to the case that were at the Prehearing Conference on March 9, 2006. The Parties present at the Prehearing Conference were: Trigen-Kansas City Energy Corporation (Trigen), Truman Medical Center, Inc. (TMC), Missouri Gas Energy (MGE), Kansas City Power & Light Company (KCPL), and Staff (Parties in attendance).

3. As a result of the discussions at the Prehearing Conference, the Parties in attendance agreed to the following procedural schedule, and other procedural matters:

Direct Testimony	March 16, 2006
Rebuttal Testimony	April 13, 2006
Surrebuttal Testimony	April 28, 2006
List of issues, order of witnesses, order of cross-examination	May 4, 2006

Prehearing Brief

May 11, 2006

Hearing

May 15-17, 2006

Closing Arguments in lieu of post-hearing brief at conclusion of above hearing

4. The Parties in attendance also agreed to request that the Commission issue an Order herein **to be effective no later than June 1, 2006**, or as close thereto as possible. In order to assist the Commission in this regard, the Parties in attendance agreed that the Commission should reduce the number of days between the issue date of the Order and the effective date of the Order from the normal 10 days. The Parties in attendance also agreed that the completion of the transcript of the hearing should be expedited as much as possible and hereby so request.

5. Since the procedural schedule proposed herein provides for the filing of Direct Testimony on March 16, 2006, the Parties in attendance request that the Commission issue an Order adopting the procedural schedule and ordering the other procedural matters addressed herein as soon as possible and in any event no later than **March 14, 2006**.

6. The Public Counsel has authorized undersigned counsel for the Staff to state herein that he has no objection to this Procedural Schedule.

WHEREFORE, the Staff, on behalf of itself and the other Parties in attendance at the Prehearing Conference, respectfully requests the Commission issue an Order adopting the procedural schedule set forth above and ordering the other procedural matters addressed herein as soon as possible and in any event no later than **March 14, 2006**.

Respectfully submitted,

/s/ Robert V. Franson

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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 10th day of March 2006.

/s/ Robert V. Franson