

**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,)
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.)

Case No. HA-2006-0294

STAFF'S RESPONSE TO MGE'S MOTION FOR RECONSIDERATION

COME NOW the Staff of the Missouri Public Service Commission (Staff) and respectfully submits as follows:

1. On April 13, 2006, the Commission issued its Order Concerning MGE's Request for Extension of Filing Deadlines and Motion for Expedited Treatment. The Commission denied MGE's request. MGE's Request had been based on its late decision to hire a consultant.

2. On April 13, 2006, MGE filed its Motion for Reconsideration and Response to Staff's Motion for Expedited Procedural Schedule and Other Procedural Matters. Staff submits that it is inappropriate for MGE to attempt to resurrect an alternative procedural schedule suggested by Staff only if the Commission decided to grant MGE's initial Motion for changes to the procedural schedule. (Staff had inadvertently filed its document with the wrong title. Staff, also on April 13, 2006 filed a corrected pleading explaining this. The corrected document was entitled: "Staff's Response to MGE's Request for Extension of Filing Deadlines and Request for Expedited Treatment.")

3. On April 13, 2006, Trigen filed its Response in Opposition to MGE's Motion for Reconsideration. Trigen correctly points out that MGE has offered a new rationale as a basis for its Motion for Reconsideration. Staff submits that while the Cargill issue raised by MGE is a

matter of interest and concern that will be addressed by the Staff via further inquiry, it is not a matter appropriately addressed by altering the procedural schedule already set in this case. Such a matter will take further investigation than can be had by a short change in the procedural schedule. MGE has the option of filing a complaint or asking the Commission to open a docket for a Staff investigation. Accordingly, Staff asks the Commission to deny MGE's Motion for Reconsideration.

WHEREFORE, the Staff respectfully requests that the Commission deny MGE's Motion for Reconsideration.

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 17th day of April 2006.

/s/ Robert V. Franson