

**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)	Case No. HA-2006-0294
steam heat distribution system to provide steam heat)	
service in Kansas City, Missouri, as an expansion of its)	
existing certified area.)	

**STAFF RESPONSE REQUESTING ADDITIONAL TIME AND
REQUEST FOR LEAVE TO LATE FILE**

Comes now the Staff of the Missouri Public Service Commission ("Staff"), by and through the Office of the Chief Staff Counsel, and files its response to the April 4, 2011 Order Directing Filing ("Order") of the Missouri Public Service Commission ("Commission"), and also makes its request for leave to late-file. In support of the Staff's request for additional time to file its recommendation and its request for leave to late-file, the Staff states as follows:

1. The Staff has endeavored to contact Trigen - Kansas City Energy Corporation, now Veolia Energy Kansas City, Inc. (File No. HN-2011-0286), to determine whether there are any outstanding matters relating to the completion of the work on the steam line to Truman Medical Center. The Staff has yet to talk with the necessary Veolia personnel. As a consequence, the Staff requests an additional seven (7) days to April 20, 2011 to report to the Commission any reason why File No. HA-2006-0294 should not be closed.

2. Undersigned Staff counsel attempted to file the Staff's request for additional time in "EFIS" after 5:00 p.m. on April 13, 2011, but having recently been switched from Windows 2003 to Windows 2007, Staff counsel was not familiar with certain changes in applying the

Adobe pdf procedure to the instant Word document, and, as a consequence, undersigned Staff counsel was not able to make the necessary filing.

3. The Staff does not make this request for additional time and undersigned Staff counsel does not make this request for leave to late-file to unduly delay matters in this file, or to vex Veolia Energy Kansas City, Inc. or the Commission.

Wherefore the Staff submits its response to the Commission's Order of April 4, 2011, requesting an additional seven (7) days to April 20, 2011 to report to the Commission any reason why File No. HA-2006-0294 should not be closed, and also requests leave to late-file this response.

Respectfully submitted,

/s/Steven Dottheim

Steven Dottheim
Chief Deputy Staff Counsel
Missouri Bar No. 29149

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7489 (Telephone)
(573) 751-9285 (Fax)
steve.dottheim@psc.mo.gov (e-mail)

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 14th day of April 2011.

/s/ Steven Dottheim