

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

In the Matter of the Application of Kansas City)
Power & Light Company for Approval to Make)
Certain Changes in Its Charges for Electric Service) File No. ER-2009-0089
to Continue the Implementation of Its Regulatory)
Plan.)

In the Matter of the Application of KCP&L Greater)
Missouri Operations Company for Approval to) File No. ER-2009-0090
Make Certain Changes in its Charges for Electric)
Service.)

STAFF MOTION FOR EXTENSION OF TIME TO RESPOND

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the Staff Counsel Office of the Missouri Public Service Commission, and for its Motion For Extension Of Time, respectfully requests that the Missouri Public Service Commission (Commission) extend the date for the Staff's filing of a response to March 12, 2010 from February 24, 2010 to KCP&L's And GMO's Initial Response To Staff Report Of The Construction Audit/Prudence Review Of Environmental Upgrades To Iatan 1 And Iatan Common Plant, which was filed on February 16, 2010. In support thereof, the Staff states as follows:

1. On February 16, 2010, Charles W. Hatfield, Karl Zobrist, and James M. Fischer, Attorneys for Kansas City Power & Light Company (KCPL) and KCP&L Greater Missouri Operations Company (GMO), caused to be filed KCP&L's And GMO's Initial Response To Staff Report Of The Construction Audit/Prudence Review Of Environmental Upgrades To Iatan I And Iatan Common Plant.

2. On February 17, 2010, the Commission issued an *Order Establishing Deadline For Responses* in which it ordered: that "[n]o later than February 24, 2010, the Staff of the

Missouri Public Service Commission shall file a reply to Kansas City Power and Light Company's response."

3. The Commission's Rule 4 CSR 240-2.080(15) provides that "[p]arties shall be allowed not more than ten (10) days from the date of filing in which to respond to any pleading unless otherwise ordered by the commission." The Commission's February 17, 2010 Order Establishing Deadline For Responses shortened the Staff's response time to eight (8) days. KCPL in its February 16, 2010 pleading did not seek to shorten the Staff's or other parties' response time from the ten (10) days provided by Commission rule. The Commission in its February 17, 2010 Order Establishing Deadline For Responses did not provide a reason for the need to shorten the response time in closed Case Nos. ER-2009-0089 and ER-2009-0090, now File Nos. ER-2009-0089 and ER-2009-0090.

4. Even if the Commission had not shortened the Staff's response time, the Staff would be requesting additional time. The Staff is presently engaged in the rate increase case of The Empire District Electric Company, Case No. ER-2010-0130, in preparing to file its revenue requirement direct case on February 26, 2010 and its rate design / class cost service direct case on March 9, 2010. In addition, the Staff is in the midst of attempting to complete important discussions / negotiations with intervenors, the Office of the Public Counsel, and the utilities in both the current Empire and the Union Electric Company, d/b/a AmerenUE rate increase cases, Case No. ER-2010-0130 and Case No. ER-2010-0036, respectively. The Staff has considered both of these efforts to require a more immediate need for attention because of, among other things, statutory time constraints than preparing a response to KCPL's February 16, 2010 pleading submitted in instant File Nos. ER-2009-0089 and ER-2009-0090.

5. Besides these matters, the Commission recently, on its own motions, ordered previously unscheduled expedited testimony filings in the AmerenUE rate increase case. On February 10, 2010, the Commission issued in Case No. ER-2010-0036 an Order Directing The Parties To Address The Concerns Raised By AmerenUE's Low-Income Residential Customers. The Commission set additional direct, rebuttal, and surrebuttal filing dates of February 19, February 26, and March 5, 2010, respectively. On February 17, 2010, the Commission issued in Case No. ER-2010-0036 an Order Directing The Parties To Submit Testimony Concerning The Appropriateness Of AmerenUE's Current Fuel Adjustment Clause. The Commission set additional direct, rebuttal, and surrebuttal filing dates of February 22, February 26, and March 5, 2010, respectively.

6. This very date, February 22, 2010, the Staff conducted a workshop respecting File Nos. EW-2009-0290, EW-2009-0291, and EW-2009-0292 and File No. EW-2010-0187. The Commission directed the Staff to submit by no later than February 25, 2010 a schedule of proposed workshops for File Nos. EW-2009-0290, EW-2009-0291, and EW-2009-0292.

7. The Staff believes that all of the aforementioned matters present more immediate needs for technical Staff and Staff counsel attention to date and in the next approximate two weeks than the filing of a response to KCPL's and GMO's February 16, 2010 pleading. KCPL and GMO do not have their Iatan 1 and Iatan 2 rate cases pending before the Commission and such filings by KCPL and GMO are not imminent. The Staff's request that the February 24, 2010 deadline for the filing of a Staff response be extended by 16 days until March 12, 2010 will neither delay any Commission proceeding nor vex KCPL and GMO and their counsel.

WHEREFORE Staff respectfully requests that the Commission grant an extension from February 24, 2010 until March 12, 2010 for Staff to file its response to KCP&L's And GMO's

Initial Response To Staff Report Of The Construction Audit/Prudence Review Of Environmental Upgrades To Iatan 1 And Iatan Common Plant.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 22nd day of February, 2010.

/s/ Steven Dottheim