

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

Joint Application of	)	
	)	
<b>Trigen-Kansas City Energy Corp.</b>	)	
	)	
and	)	Case No. HM-2004-0618
	)	
<b>Thermal North America, Inc.</b>	)	
	)	
For Grant of the Authority Necessary	)	
for the Transfer of Control, Sale of	)	
All Stock Currently Owned by	)	
Trigen Energy Corporation, Inc. to	)	
Thermal North America, Inc.	)	

**MOTION TO CANCEL OR DELAY HEARINGS  
AND REQUEST FOR EXPEDITED RULING**

COME NOW Joint Applicants, Staff and the Office of Public Counsel and, for their Motion to Cancel or Delay Hearings and Request for Expedited Ruling, state as follows:

1. All parties have agreed in principal and expect to file within the next two (2) business days a Stipulation and Agreement resolving all but one issue in this case. With respect to the outstanding issue, the parties have agreed to submit the matter for decision based upon prefiled testimony and prehearing briefing and certain additional items which the parties will present as containing the entirety of the stipulated record on this issue. Further, the parties have agreed to waive cross-examination of all witnesses that prefiled testimony.

2. The parties request cancellation of the hearing currently scheduled for this matter on November 22 through 24, 2004. In the alternative, the parties request that the Commission cancel the hearing currently scheduled for Monday, November 22, 2004. If the

Commission perceives a need for an on the record proceeding, the parties' preference would be to hold the hearing on November 23, 2004.

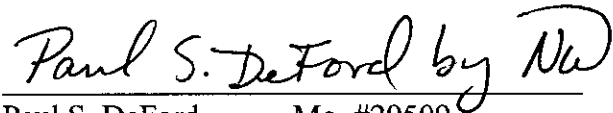
3. The parties request expedited consideration of this motion due to the shortness of time in arranging travel for numerous necessary participants.

WHEREFORE, for the foregoing reasons, the parties request the Commission grant this motion to cancel or delay hearings.

Respectfully submitted,

LATHROP & GAGE, L.C.

Dated: November 19, 2004



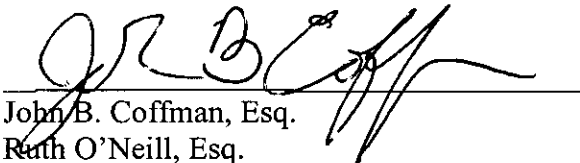
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Dated: 11-19-04