

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

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| Trigen-Kansas City Energy Corporation's) | |
| Application for Expansion of its Certificate of) | |
| Convenience and Necessity to Provide Steam) | Case No. HA-2006-0294 |
| Heat Service in Kansas City, MO) | |

**MGE'S REQUEST FOR EXTENSION OF FILING DEADLINES
AND REQUEST FOR EXPEDITED TREATMENT**

Comes now Missouri Gas Energy (MGE), by its attorneys, and moves this Commission for an extension of certain filing deadlines in this matter. MGE also requests that the Commission rule upon this request for an extension of time as soon as possible. In support of its request, MGE respectfully states unto the Commission as follows:

1. On March 10, 2006, the Staff of the Commission filed a proposed procedural schedule which had been agreed upon by all parties. Thereafter, the Commission adopted said schedule.
2. Pursuant to the Order Adopting Procedural Schedule, direct testimony was due on March 16, rebuttal testimony is due on April 13, and surrebuttal testimony is due on April 28. A list of issues is due on May 4 and prehearing briefs are due on May 11. The hearing in this matter is scheduled for May 15-17, 2006.
3. MGE served data requests on Trigen and Truman Medical Center on March 20, 2006. Responses were received from Trigen on March 24 and 29, but many responses were marked as highly confidential. Responses were received from Truman on April 10, but all responses were marked as highly confidential.
4. MGE had not planned on hiring an outside consultant for this matter. As many of the data request responses from Trigen and Truman were marked as highly confidential, however, MGE decided to hire a consultant to review the responses. Accordingly, Jay Cummings was retained by MGE, and Mr. Cummings signed a Nondisclosure Agreement

on April 10. Mr. Cummings has not yet had an opportunity to review the data request responses and the other HC information involved with this proceeding.

5. MGE is requesting that the deadlines be extended as follows:

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| Rebuttal Testimony | - | April 27 (only as to MGE) |
| Surrebuttal Testimony | - | May 5 (for all parties) |
| List of Issues, Order of Witnesses and Cross | - | May 8 (extension of four days) |
| Prehearing Brief | - | May 12 (extension of one day) |

MGE is not requesting a continuance from the hearing date, in order to minimize any inconvenience for the other parties to this case. Further, if MGE is granted an extension in order to file testimony on April 27, MGE will agree to a five-day turnaround for data requests which are served in follow up to MGE's testimony.

6. This motion is not made to hinder or delay, but for the true reasons set forth above, and granting of the same would be in the best interest of justice and would not prejudice any other party.

WHEREFORE, MGE respectfully requests that the filing deadlines be extended as set out above.

Respectfully submitted,

/s/ Diana C. Carter

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered, sent by U.S. mail, or electronically transmitted on this 12th day of April, 2006, to all parties of record.

/s/ Diana C. Carter