

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

<b>In the Matter of the Application of</b>	)	
<b>The Cathedral Square Corporation,</b>	)	
<b>a Missouri Non-Profit Corporation,</b>	)	
<b>For a Variance from Kansas City</b>	)	<b><u>Case No. EO-2012-0141</u></b>
<b>Power &amp; Light Company's</b>	)	
<b>General Rules and Regulations</b>	)	
<b>Requiring Individual Metering</b>	)	

**THE CATHEDRAL SQUARE CORPORATION'S  
MOTION FOR EXTENSION OF TIME  
TO FILE DIRECT TESTIMONY AND EXHIBITS**

COMES NOW, Applicant The Cathedral Square Corporation and for its Motion for Extension of Time to File Direct Testimony and Exhibits, states:

1. On January 19, 2012, the Commission issued an Order Setting Procedural Schedule. As the parties agreed, the Commission ordered the parties to file Direct Testimony and Exhibits no later than February 13, 2012.
2. Because February 13, 2012 was a state holiday, the Commission issued its Order Amending Procedural Schedule on February 1, 2012, extending the deadline for Direct Testimony and Exhibits to February 14, 2012.
3. On February 14, 2012, Applicant filed its Direct Testimony of William L. Foreman, Sr., together with the filing of Exhibits A, B, C, D, E, and F for Mr. Foreman's testimony.
4. Direct Testimony of Jeffrey G. Flathman, together with Exhibits A, B, C, D, E, F and G was also prepared and finalized, and Counsel for Applicant was anticipating receipt of the signed

Affidavit of Mr. Flathman by 4:15PM in order to file the same with the Commission by the February 14 deadline. However, Mr. Flathman is out of town and has not been able to transmit the signed Affidavit by the filing of this Motion, at 6:30PM today.

5. Counsel for Applicant has not had the opportunity to contact counsel for KCP&L or Staff to advise them of Applicant's need to extend the time to file Mr. Flathman's Direct Testimony and Exhibits, and therefore, Applicant does not know their position on this request for the extension of time.

6. Applicant is in need of additional time to file the necessary Direct Testimony and Exhibits on this case.

**WHEREFORE**, Applicant moves the Commission to extend from February 14, 2012, to February 17, 2012, the time for Applicant to file its Direct Testimony and Exhibits.

Respectfully submitted,

**STEWART LAW FIRM, L.C.**

By: 

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ATTORNEYS FOR APPLICANT

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 14<sup>th</sup> day of February, 2012.

  
Shawn E. Stewart