

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

In the Matter of the Application of Marshall Municipal)
Utilities and Central Missouri Electric Cooperative, Inc.)
for Approval of an Amendment to an Approved)
Territorial Agreement.)

File No. EO-2015-0137

MOTION FOR EXTENSION OF TIME

COMES NOW Kansas City Power & Light Company (“KCP&L”) and hereby respectfully requests an extension of time to respond to *Staff’s Recommendation for Approval of Amended Territorial Agreement*.

1. On November 25, 2014, Marshall Municipal Utilities and Central Missouri Electric Cooperative, Inc. filed a *Joint Application for Approval of Amendment to Approved Territorial Agreement*.

2. On January 9, 2015, Missouri Public Service Commission (“Commission”) Staff (“Staff”) filed *Staff’s Recommendation for Approval of Amended Territorial Agreement*. In its recommendation, Staff indicated that the location of the structure at issue was within the service territory of KCP&L and there was no indication that KCP&L was notified of the Joint Application.

3. On January 12, 2015 the Commission filed an *Order Directing Notice and Setting Deadline for Responses*. Paragraph 1 ordered the Data Center to forward a copy of the *Order* to KCP&L.

4. KCP&L became aware of the aforementioned *Order* on the afternoon of Friday January 16, 2015.

5. Because KCP&L only recently became aware of this matter and because KCP&L personnel will need to become acquainted with the facts and discuss internally in order to develop a response to the Staff Recommendation, it will not be possible for KCP&L to prepare a substantive response to the Staff Recommendation for filing by January 22, 2015.

WHEREFORE, for the reasons stated above, KCP&L respectfully requests the Commission grant it an extension of time to no later than January 30, 2015 to respond to *Staff's Recommendation for Approval of Amended Territorial Agreement*.

Respectfully submitted,

/s/ Robert J. Hack

Robert J. Hack, MBN 36496
Phone: (816) 556-2791
E-mail: rob.hack@kcpl.com
Roger W. Steiner, MBN 39586
Phone: (816) 556-2314
E-mail: roger.steiner@kcpl.com
Kansas City Power & Light Company
1200 Main – 16th Floor
Kansas City, Missouri 64105
Fax: (816) 556-2787

Attorney for Kansas City Power & Light Company

Certificate of Service

I hereby certify that a true and correct copy of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all parties of record on this 22nd day of January, 2015.

/s/ Robert J. Hack

Attorney for Kansas City Power & Light Company