

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

In the Matter of the Application of KCP&L)	
Greater Missouri Operations Company for)	<u>Case No. ER-2009-0090</u>
Approval to Make Certain Changes in its)	Tariff No. YE-2010-0016
Charges for Electric Service.)	

In the Matter of the Application of Kansas)	
City Power & Light Company for Approval)	<u>Case No. ER-2009-0089</u>
to Make Certain Changes in its Charges for)	Tariff No. JE-2010-0014
Electric Service to Continue the)	
Implementation of its Regulatory Plan)	

**MOTION TO EXPAND TIME FOR
FILING OF STAFF'S RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through Counsel, and for its Motion states:

1. On July 8, 2009, Kansas City Power & Light Company ("KCP&L") filed tariff sheets pursuant to the Missouri Public Service Commission's ("Commission") June 10th Order Approving Non-Unanimous Stipulations and Agreements and Authorizing Tariff Filing, bearing an effective date of September 1, 2009.

2. Also on July 8, 2009, KCP&L Greater Missouri Operations Company ("GMO") filed tariff sheets for both the former Aquila MPS and Aquila L&P service territories, pursuant to the Commission's June 10th Order Approving Non-Unanimous Stipulations and Agreements and Authorizing Tariff Filing, bearing an effective date of September 1, 2009.

3. Also on July 8, 2009, the Commission entered orders in both Case Nos. ER-2009-0089 and ER-2009-0090 directing its Staff to review the tariff sheets and file a recommendation, by no later than July 15, 2009, as to whether the tariff sheets are in compliance with the

Commission's Orders. In each case, the Commission ordered that any party wishing to respond to Staff's recommendation file its response no later than five days after the recommendation is filed.

4. Staff states that given the press of other matters, it is not capable of reviewing and processing these three sets of tariff filings, GMO (former Aquila MPS and Aquila L&P) and KCP&L, and preparing Recommendations based there-upon in the five business days allotted by the Commission's July 8, 2009 orders.

5. Staff respectfully requests expansion of the time to file its Recommendations to July 22, 2009, and modification of the time for other parties to respond to the Staff's Recommendation accordingly.

6. Staff has contacted counsel for Praxair, Walmart Stores, Inc., AG Processing, and the Sedalia Industrial Energy Users Association, who typically review tariff filings, and counsel for GMO and KCP&L, as well as the Public Counsel, none of which indicated opposition to this request.

7. Staff does not believe that any party will be harmed by the granting of its request for an extension of time to file its Recommendations, nor does Staff make its request so as to unduly delay these proceedings.

WHEREFORE, Staff requests that the Commission expand the time for the filing of its Recommendations until July 22, 2009.

Respectfully submitted,

/s/ Sarah Kliethermes

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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 10th day of July, 2009.

/s/ Sarah Kliethermes