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

In the Matter of the Application of Kansas	)	
City Power & Light Company for Approval	)	
to Make Certain Changes in its Charges for	)	Case No. ER-2010-0355
Electric Service to Continue the	)	
Implementation of its Regulatory Plan	)	

## **MOTION FOR EXTENSION OF TIME**

**COMES NOW** the Missouri Retailers Association (MRA) and asks the Commission to extend until November 17, 2010, the time for MRA to file testimony concerning the prudence of the IATAN 1 Air Quality Control System (AQCS) and IATAN 2 plant additions. In support of its motion, MRA states:

- 1. MRA has retained Vantage Energy Consultants, LLC, to provide testimony in these cases concerning the prudency of KCPL's management of the IATAN 1 AQCS and IATAN 2 plant construction projects. Vantage has provided testimony to the Kansas Corporation Commission (KCC) on the subject in proceedings before that Commission.
- 2. In preparing its testimony before the KCC, Vantage acquired information from KCPL that is subject to a protective order of the KCC.
- 3. MRA has not yet been able to secure authorization from the KCC for Vantage to use certain confidential materials in the pending Missouri cases. MRA expects to be able to resolve the issue in time to file testimony on or before November 17, 2010, with this Commission. MRA will file promptly after confidentiality issues are resolved.
- 4. Although MRA expects that there will be some difference between the testimony filed before the KCC and the testimony filed before this Commission, KCPL has had the opportunity in

Kansas to review and investigate at length the testimony of Mr. Walter Drabinski, the expert providing Vantage's testimony.

- 5. In this respect, a two-week delay will not unduly burden KCPL, and will provide the Commission with substantial information in the cases which it will not otherwise obtain.
- 6. MRA does not make this motion to unduly delay theses proceedings, and will file the testimony as promptly as possible after the issue has been resolved by the KCC.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing Motion for Extension of Time was sent by electronic transmission on this 1<sup>st</sup> day of November, 2010, to the following parties of record:

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