

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

In the matter of the application of Trigen-)
Kansas City Energy Corporation for a)
Certificate of Public Convenience and)
Necessity authorizing it to construct, install,) Case No. HA-2006-0294
own, operate, control, manage and maintain)
a steam heat distribution system to provide)
steam heat service in Kansas City, Missouri,)
as an expansion of its existing certified area.)

**REQUEST FOR ADDITIONAL EXTENSION OF TIME TO FILE
REPORT AND RECOMMENDATION**

COMES NOW Trigen-Kansas City Energy Corporation ("Trigen"), by and through the undersigned counsel, and respectfully submits this Request for Additional Extension of Time to File Report and Recommendation and in support thereof states:

1. In response to a request by Trigen, by Order issued on December 20, 2007, the Commission granted Trigen until March 31, 2008, to file a report and recommendation as delineated in the body of said Order and the Commission's June 12, 2007 and October 2, 2007 orders. At the time of Trigen's request which led to the December 20 Order, the date of substantial completion of the steam pipeline involved in this case was reasonably anticipated to be January 31, 2008.

2. Unfortunately, due to further construction delays outside the control of Trigen, construction will still be incomplete as of March 31, 2008. More specifically, the contractor has experienced difficulties and delays tunneling under I-670; however, progress has been made in recent weeks and a replacement boring crew has been brought on board. At this time, boring is anticipated to be complete in mid-April 2008. Once

boring is complete, pipeline construction/insertion will begin, which is expected to take several weeks. The date of substantial completion, i.e. the date upon which commercial steam delivery is to be commenced, is now reasonably anticipated to be May 31, 2008. Accordingly, Trigen will be unable to file the ordered final report and recommendation by March 31, 2008. Given the estimated substantial completion date of May 31, the need to compile and address the punchlist of outstanding work customary for construction projects of this nature, receive final payments from TMC, and the need to compile the final report and recommendation, Trigen requests until July 31, 2008, to file the report and recommendation as delineated in the Commission's orders of December 20, 2007, October 2, 2007 and June 12, 2007.

WHEREFORE, Trigen respectfully requests that the Commission grant Trigen until July 31, 2008, to file its final report and recommendation as ordered in the Commission's June 12, October 2 and December 20, 2007 orders.

Respectfully submitted,

/s/ **Jeffrey A. Keevil**

Jeffrey A. Keevil #33825
Charles Brent Stewart #34885
STEWART & KEEVIL, L.L.C.
4603 John Garry Drive, Suite 11
Columbia, Missouri 65203
(573) 499-0635
(573) 499-0638 (fax)
per594@aol.com
stewart499@aol.com

ATTORNEYS FOR TRIGEN-KANSAS
CITY ENERGY CORPORATION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing pleading was sent to counsel for parties of record by depositing same in the U.S. Mail, first class postage prepaid, by hand-delivery, or by electronic mail transmission, this 26th day of March, 2008.

/s/ Jeffrey A. Keevil
