

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

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for)
Approval to Make Certain Changes in its Charges) Case No. ER-2010-0356
For Electric Service)

**MOTION FOR EXTENSION OF TIME FOR FILING
RESPONSE TO APPLICATION FOR REHEARING**

COME NOW the Office of the Public Counsel, AG Processing, Inc. a cooperative, and the Sedalia Industrial Energy Users' Association (collectively "Signatories") and for their Motion for Extension of Time for Filing Responses to GMO's Application for Rehearing respectfully state as follows:

1. On May 4, 2011, the Commission issued its Report and Order in this proceeding. Late on Friday, May 13, 2011, GMO filed its Application for Rehearing of various portions of the Commission's Report and Order. The Commission has ordered responses to the GMO Application for Rehearing to be filed on May 20, 2011.

2. While endeavoring to meet the Commission's May 20, 2011 deadline, the undersigned parties have been unable, as a result of other Commission business, to prepare their responses. Specifically, undersigned counsel was involved in an evidentiary hearing in Case No. EO-2008-0216 on Monday; a hearing regarding the rewrite of the Commission's Chapter 2 rules on Thursday; and an evidentiary hearing in Case No. ER-2011-0038 on Friday. In addition, counsel has been deeply involved in recent efforts to settle Empire's pending rate case, Case No. ER-2011-0004. The obvious implication of all of these Commission proceedings is that counsel has been unable to devote the necessary time to the preparation of their responses.

3. It is also important to recognize that GMO's Application for Rehearing is 32 pages and addresses numerous different topics. Therefore, responding to this Application involves much more work and time than responding to a simple 2 page Application. The scope of the GMO Application for Rehearing, in addition to the other pending Commission proceedings, has made it impossible for undersigned counsel to complete any response to the GMO Application for Rehearing.

4. Given the impossibility of preparing their Applications for Rehearing, counsel asks that it be granted an extension and be permitted to file their response to the GMO application on May 23, 2011. By granting this extension, the Commission should still have plenty of time to review the response to the GMO Application in time for its deliberations in the May 25 scheduled agenda.

WHEREFORE, the Signatories respectfully request that the Commission grant it an extension for filing of its Response to the GMO Application for Rehearing until May 23, 2011.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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AG PROCESSING INC. AND THE
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

A handwritten signature in black ink, appearing to read "David L. Woodsmall". The signature is written in a cursive style with a large initial "D".

David L. Woodsmall

Dated: May 20, 2011