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PLEASE REPLY TO MISSOURI OFFICE

\* ADMITTED IN KANSAS ONLY  
\*\* ADMITTED IN KANSAS AND MISSOURI  
ALL OTHERS ADMITTED IN MISSOURI

VIA FEDERAL EXPRESS

January 27, 1987

Mr. Harvey G. Hubbs,  
Secretary  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

RE: Case No. HO-86-139 In the matter of the  
investigation of steam service rendered  
by Kansas City Power & Light Company

Dear Mr. Hubbs:

Enclosed for filing in the above-captioned case is an original and fourteen copies of Intervenor's Response to Staff's Motion for Extension of Time. Additionally, we have enclosed a copy that we would request that you file-stamp and return to us in the enclosed self-addressed and stamped envelope.

Copies of this pleading have been sent to all parties of record.

We appreciate your cooperation.

Very truly yours,

DIETRICH, DAVIS, DICUS, ROWLANDS,  
SCHMITT & GORMAN

By

*Darry Gene Sands*  
Darry Gene Sands

DGS/bks  
cc/All parties of record  
Intervenors

FILED  
JAN 28 1987  
FEDERAL COURTHOUSE  
JEFFERSON CITY, MISSOURI

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

IN THE MATTER OF THE INVESTIGATION )  
OF STEAM SERVICE RENDERED BY ) Case No. HO-86-139  
KANSAS CITY POWER & LIGHT COMPANY )

RESPONSE BY INTERVENORS BOATMEN'S FIRST NATIONAL BANK  
OF KANSAS CITY, et al. TO STAFF'S MOTION FOR EXTENSION OF TIME  
AND COUNTER-PROPOSALS TO PROPOSED TIMETABLE

Come now Intervenor's Boatmen's First National Bank of  
Kansas City, et al. (hereinafter "Intervenors"), by and  
through their attorneys of record, and in response to the  
Staff's Motion for Extension of Time state as follows:

Intervenors have no objection to the proposed extension  
of time to file testimony from February 2 to February 23,  
1987. However, Intervenor's would request that their filing  
deadline likewise be moved to February 23, 1987 if Staff's  
Motion is granted. Additionally, because of prior commitments,  
counsel for Intervenor's would propose the following timetable  
for other proceedings in lieu of that suggested by the  
Staff:

<u>Event</u>	<u>Current Date</u>	<u>Staff Recommended Date</u>	<u>Counter- Proposal</u>
Prehearing Conference	February 23	March 16	March 23
Hearing Memorandum Due	February 27	March 20	March 27
Hearing Dates	March 9-March 13	March 30-April 10	April 6-April 17

Counsel for Intervenor's would note that in each case  
the counter-proposed date(s) is exactly one week later than  
the date proposed by the Staff. Counsel for Intervenor's has

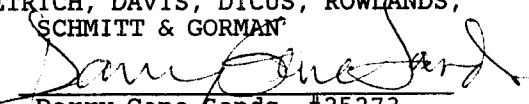
been advised by Deputy General Counsel that such alternative dates are acceptable to the Staff and its consultants.

WHEREFORE, for the reasons stated herein, counsel for Intervenors would request that the Commission extend the time for filing testimony by all affected parties, including Intervenors, to February 23, 1987, but reschedule the remaining proceedings as hereinabove suggested.

Respectfully submitted,

DIETRICH, DAVIS, DICUS, ROWLANDS,  
SCHMITT & GORMAN

By:

  
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he mailed copies of the foregoing to the following parties by first-class mail, postage prepaid this 27<sup>th</sup> day of January, 1987: Mark G. English, Kansas City Power & Light Company, 1330 Baltimore Avenue, Kansas City, Missouri 64105, Mary Ann Young, Public Service Commission, P.O. Box 360, Jefferson City, Missouri 65103, David Claycomb, 2460 Pershing Road, Kansas City, Missouri 64108, Martin J. Bregman, 818 Kansas Avenue, Topeka, Kansas 66601, William Clark Kelly, Assistant Attorney General, P.O. Box 899, Jefferson City, Missouri 65102, David L. Schwaller, P.O. Box 809, Jefferson City, Missouri 65102, Carrol C. Kennett, Assistant City Attorney, 2800 City Hall, 414 East 12th Street, Kansas City, Missouri 64106, Jeremiah D. Finnegan, 4225 Baltimore, Kansas City, Missouri 64111, John B. Williams, County Counselor, Jackson County Courthouse, 415 East 12th Street, Kansas City, Missouri 64106, Office of Public Counsel, P.O. Box 7800, Jefferson City, Missouri 65102.

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