BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Eddie Shepherd,)	
)	
Complainant,)	
)	
VS.)	Case No. EC-2011-0373
)	
KCP&L Greater Missouri Operations)	
Company,)	
)	
Respondent.)	

MOTION FOR EXTENSION OF TIME TO FILE LIST OF ISSUES, LIST OF WITNESSES AND ORDER OF CROSS EXAMINATION

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and on the behalf of the Staff, Mr. Eddie Shepherd (Complainant), and KCP&L Greater Missouri Operations Company (GMO or Company), known herein jointly as the Parties, files this *Motion For Extension Of Time To File List Of Issues, List Of Witnesses And Order Of Cross Examination (Motion)* with the Missouri Public Service Commission (Commission) respectfully stating the following:

- 1. On July 25, 2011, the Staff filed a *Joint Proposed Procedural Schedule* stating that the Parties would file a joint list of issues, joint list of witnesses and order of cross examination (joint list) two weeks from when the Commission set an evidentiary hearing in this matter.
- 2. On July 26, 2011, the Commission set the evidentiary hearing in the matter for September 15, 2011, and ordered the Parties to file the joint list by September 1, 2011, and to participate in a prehearing conference on September 8, 2011.

- 3. After discussion with the Parties, it has become apparent that participating in the prehearing conference prior to filing a joint list will aid the Parties tremendously in producing a joint list beneficial not only to the Parties, but for the Commission's decision in this matter.
- 4. Allowing until September 8, 2011, to file a joint list will also allow the Commission to rule on the other pending motions before it, which will also aid the Parties in the preparation of a joint list.

WHEREFORE, the Staff submits this *Motion* on behalf of the Parties and respectfully requests that the Commission allow until September 8, 2011, for the filing of a joint list of issues, list of witnesses and order of cross examination.

Respectfully submitted,

/s/ Jennifer Hernandez

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or by electronic mail to all counsel of record on this 1st day of September, 2011.

/s/ Jennifer Hernandez