

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

The Staff of the Missouri Public Service)
Commission,)
)
Complainant,)
)
vs.)
)
KCP&L Greater Missouri Operations)
Company,)
)
Respondent.)

Case No. EC-2011-0250

**Staff's Motion for an Extension of Time
Within Which to Respond to
Order Directing Filing**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its Motion for an Extension of Time Within Which to Respond to the Commission's *Order Directing Filing*, issued on March 15, 2011, states as follows:

1. Staff filed its Complaint on February 8, 2011, alleging that Respondent KCP&L Greater Missouri Operations Company ("GMO") violated certain Commission rules and orders by filing a deficient Integrated Resource Plan ("IRP").
2. On March 11, 2011, following due notice of Staff's complaint by the Commission, Respondent filed its *Answer*, including three affirmative defenses that the Commission in its *Order* characterizes as a "motion to dismiss." The

Commission's *Order* directs Staff to respond to GMO's *Motion to Dismiss* not later than March 31, 2011.

3. The undersigned is unable to respond by March 31, 2011, due to the press of other work, including depositions in the pending Ameren Missouri rate case on March 31; a reply brief in the pending GMO rate case on April 1; PERforM appraisals that must be completed by March 31; and sundry other matters, both case-related and administrative.

4. The undersigned has inquired of counsel for GMO, who authorized him to state that they consent to an extension of one week. The undersigned also inquired of the Public Counsel, who has no objection.

WHEREFORE, Staff prays that the Commission will extend the due date for its response referred to above by one week, up to and including Thursday, April 7, 2011; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

s/ Kevin A. Thompson
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Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this **29th day of March, 2011**, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

s/ Kevin A. Thompson