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January 10, 1989

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Staff Director

HARVEY G. HUBBS
Secretary

MARY ANN YOUNG
General Counsel

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

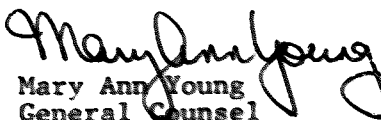
Re: Case No. HO-86-139 - In the matter of the investigation of
steam service rendered by Kansas City Power & Light Company.

Dear Mr. Hubbs:

Enclosed for filing in the above-captioned case is an
original and fourteen (14) conformed copies of Staff's Request
for Additional Time to Respond to Report and Motion. Copies have
been sent this date to all parties of record.

Thank you for your cooperation in this matter.

Sincerely,


Mary Ann Young
General Counsel

MAY:nsh

Enclosures

cc: All parties of record

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JAN 10 1989

PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the investigation)
of steam service rendered by Kansas))
City Power & Light Company.)

Case No. HO-86-139

REQUEST FOR ADDITIONAL TIME TO RESPOND TO REPORT AND MOTION

Comes now the Staff of the Missouri Public Service Commission ("Staff") and for its request for additional time to respond to report and motion, states as follows:

On December 30, 1988, Kansas City Power & Light Company (KCPL) filed its Report Regarding Its Good Faith Efforts To Sell Its Kansas City, Missouri, Steam Distribution System and Motion to Confirm Termination of Steam Utility Service And To Close Docket. The Staff requests time beyond the generally permitted ten (10) days to respond to this Report and Motion for the following reasons:

1. Staff is in the process of conducting its independent investigation of the documentation supporting KCPL's Report and Motion. At the time of this filing, Staff has requested and received at least a portion of those documents, and is in the process of reviewing them. However, this review, and any subsequent requests for information, will take an additional week to ten days.

2. Staff has been contacted by parties interested in the outcome of this proceeding who have indicated that they may be submitting pleadings or other statements of position to the Commission. Staff believes the concerns stated by these interested parties may merit consideration in Staff's response to KCPL's Report. If these interested parties submit their positions within the Commission's ten-day period, Staff will need an additional week to ten days to complete its analysis of this input.

3. An additional 10-day period will permit coordination of Staff counsel with Staff technical resources in responding to KCPL's Report. The undersigned is involved in an issue in Staff's complaint case against Southwestern Bell which is scheduled for hearing on Tuesday, Wednesday and Thursday, January 10-12, 1989. Due to this

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PUBLIC SERVICE COMMISSION

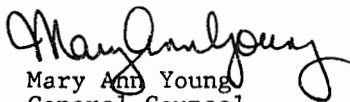
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conflict, she will be unable to work with the technical staff involved in the KCPL steam case until Friday, January 13 at the earliest.

4. This request for additional time is not intended to delay resolution of this matter, but to present a thorough analysis of what has taken place in regard to KCPL's attempt to sell its downtown Kansas City steam system.

WHEREFORE, for all the reasons hereinabove stated, Staff requests additional time, up to and including Friday, January 20, 1989, in which to respond to KCPL's Report and Motion.

Respectfully submitted,


Mary Ann Young
General Counsel

Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102
(314) 751-7485

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all parties of record this 10th day of January, 1989.

