

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

In the matter of the application of Trigen-)
Kansas City Energy Corporation for a)
Certificate of Public Convenience and)
Necessity authorizing it to construct, install,) Case No. HA-2006-0294
own, operate, control, manage and maintain)
a steam heat distribution system to provide)
steam heat service in Kansas City, Missouri,)
as an expansion of its existing certified area.)

**REQUEST FOR EXTENSION OF TIME TO FILE
REPORT AND RECOMMENDATION**

COMES NOW Trigen-Kansas City Energy Corporation (“Trigen”), by and through the undersigned counsel, and respectfully submits this Request for Extension of Time to File Report and Recommendation and in support thereof states:

1. On September 28, 2007, Trigen filed a status report in this case and in said status report requested additional time to file its final report and recommendation which it had previously been ordered to file herein. In response to Trigen’s September 28, 2007, filing, by Order issued on October 2, 2007, Trigen was granted until December 31, 2007, to file a report and recommendation as delineated in the body of such order and the Commission’s June 12, 2007 order.

2. At the time Trigen filed its September 28, 2007, status report Trigen was reasonably optimistic that substantial completion of the steam pipeline involved in this case, and which the final report and recommendation is to reflect, would take place by October 31, 2007. However, as noted in that September 28 status report, construction projects such as this pipeline are often subjected to delays, particularly when being

constructed in urban areas. Unfortunately, additional construction delays outside the control of Trigen have pushed the expected date of substantial completion of this project back even further. Accordingly, Trigen will be unable to file the ordered final report and recommendation by December 31, 2007. The date of substantial completion, i.e. the operation date upon which steam service is to be commenced, is now reasonably anticipated to be January 31, 2008. Given this estimated substantial completion date, the need to compile and address the punchlist of outstanding work customary for construction projects of this nature, receive final payments from TMC, and the need to compile the final report and recommendation, Trigen requests until March 31, 2008, to file the report and recommendation as delineated in the body of the Commission's October 2, 2007 order and the Commission's June 12, 2007 order.

WHEREFORE, Trigen respectfully requests that the Commission grant Trigen until March 31, 2008, to file its final report and recommendation as ordered in the Commission's June 12 and October 2 orders.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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ATTORNEYS FOR TRIGEN-KANSAS
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing pleading was sent to counsel for parties of record by depositing same in the U.S. Mail, first class postage prepaid, by hand-delivery, or by electronic mail transmission, this 19th day of December, 2007.

/s/ Jeffrey A. Keevil
