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

In the Matter of the 2008 Resource Plan of	)	
Kansas City Power & Light Company	)	Case No. EE-2008-0034
Pursuant to 4 CSR 240-22	)	

## JOINT REQUEST OF THE PARITES FOR AN EXTENSION OF TIME TO FACILITATE SETTLEMENT DISCUSSIONS

Pursuant to 4 C.S.R. 240-2.080, Kansas City Power & Light Company ("KCP&L"), the Staff of the Missouri Public Service Commission ("Staff"), the Office of Public Counsel ("OPC"), the Missouri Department of Natural Resources ("MDNR"), and Dogwood Energy, LLC ("Dogwood") (collectively, the "Parties") hereby jointly request that they be given until April 10, 2009 to attempt to reach a joint agreement regarding concerns the non-KCP&L Parties raised about KCP&L's Electric Utility Resource Planning submission ("IRP") in the above-captioned case. In support hereof, the Parties offer as follows:

- 1. On August 5, 2008, KCP&L submitted its IRP. Since that time, KCP&L has met with Staff, OPC, and other interested parties concerning issues and concerns raised by those parties with respect to KCP&L's submission. In an attempt to respond to those issues, KCP&L submitted supplemental information concerning its IRP on December 24, 2008.
- 2. On January 8, 2009, each of the non-KCP&L Parties submitted comments identifying concerns and in some cases alleging certain deficiencies in KCP&L's IRP. No other party to this case alleged any deficiencies. Pursuant to 4 C.S.R. 240-22.080(8),
  - If the staff, public counsel or any intervenor finds deficiencies, it shall work with the electric utility and the other parties to reach, within forty-five (45) days of the date that the report or comments were submitted, a joint agreement on a plan to remedy the identified deficiencies.
- 3. Because the IRP comments of the non-KCP&L Parties were submitted on January 8, 2009, the deadline to reach a joint agreement on a plan to remedy the alleged deficiencies was

February 23, 2009. The Parties continued to have settlement discussions, but were not able to arrive at a settlement by February 23, 2009. Consequently, the Parties requested that the Commission extend the deadline for reaching a joint agreement on a remedy plan, as contemplated in 4 C.S.R. 240-22.080(8), until March 31, 2009.

4. The Parties have continued to have settlement discussions and believe they are very close to resolving the majority, if not all, of the remaining issues, but believe they will not be able to have a final settlement ready to be filed by March 31, 2009. Consequently, the Parties respectfully request that the Commission extend the deadline for filing a Joint Report and Partial Stipulation and Agreement to April 10, 2009. The Parties are committed to filing the Report as quickly as possible, but recognize it may take until April 10, 2009 in order for all the Parties to have sufficient time to review the document. Good cause exists to grant the Parties' request for extension. No party to this case will be prejudiced by such an extension, and allowing the Parties to negotiate a mutually agreeable resolution of the matters at issue in this case will avoid unnecessarily taxing Commission resources.

For the foregoing reasons, the Parties respectfully request that the Commission extend the deadline for reaching agreement on a remedy plan, as contemplated in 4 C.S.R. 240-22.080(8), until April 10, 2009.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 27<sup>h</sup> day of March, 2009.

/s/ Shelley A. Woods

Shelley A. Woods