

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

The Staff of the Missouri Public)
Service Commission,)
 Complainant,)
)
 vs.)
)
KCP&L Greater Missouri Operations)
Company and Kansas City Power &)
Light Company,)
 Respondents.)

Case No. EC-2009-0430

STAFF’S MOTION TO EXPAND TIME FOR RESPONSE

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through Counsel, and for its Motion states:

1. On June 26, 2009, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company (“Companies”) filed their Answer and Motion for Determination on the Pleadings (“Answer and Motion”).

2. The Answer and Motion contains a number of factual assertions, as well as a number of affirmative defenses, that will require a Response from Staff, and is drafted in an unconventional format.

3. Ordinary rules of procedure allow ten days, including holidays and weekends, for the filing of pleadings responsive to an Answer, thus Responses to the Companies’ Answer and Motion would fall due by July 6, 2009.

4. Given the novel format utilized by the Companies for their Answer and Motion, and the press of other matters, including the Chapter 22 Rulemaking Workshops and several scheduled trainings, and the intervening Holiday, Staff respectfully requests expansion of the time to file Responses to the Companies’ Answer and Motion to July 16, 2009.

5. Staff has contacted counsel for the Companies, as well as the Public Counsel, and neither opposes this request.

6. Staff does not believe that any party will be harmed by the granting of its request for an extension of time to file its Response, nor does Staff make its request so as to unduly delay these proceedings.

WHEREFORE, Staff requests that the Commission expand the time for the filing of Responses to the Companies' Answer and Motion until July 16, 2009.

Respectfully submitted,

/s/ Sarah Kliethermes

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 1st day of July, 2009.

/s/ Sarah Kliethermes