

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

**BRIARCLIFF DEVELOPMENT COMPANY, )**  
**a Missouri Corporation )**

**COMPLAINANT )**

**v. )**

**KANSAS CITY POWER & LIGHT )**  
**COMPANY )**

**RESPONDENT )**

**CASE NO. EC-2011-0383**

**MOTION OF BRIARCLIFF DEVELOPMENT COMPANY FOR EXTENSION OF TIME  
TO FILE JOINT STIPULATION OF NON-DISPUTED FACTS AND MOTION FOR  
EXPEDITED TREATMENT**

COMES NOW, Complainant, by its attorneys, and moves for an extension of time from January 11, 2012 until at least January 18, 2012 or preferably until January 19, 2012 to comply with the Commission's Order Setting Procedural Schedule to file the Joint Stipulation of Non-Disputed Material Facts now due on January 11th, for the following reasons:

1. That Complainant's attorney has just learned that the surgery that was tentatively scheduled for him for January 11th is now going forward as planned early tomorrow morning. As a result, Complainant's attorney will not be in the office tomorrow as well as January 12th and quite probably January 13th. Furthermore, since January 16th is a holiday and on January 17th oral argument is scheduled in Cole County Circuit Court on the GMO rate case review, Complainant's attorney needs at least until the 18th of January and preferably the 19th of January to allow adequate time for the parties to agree on the Joint Stipulation.

2. That Complainant's attorney sent out a proposed draft stipulation to the Staff and the Company on January 5th.

3. That Company responded with a draft late on January 9th which Complainant's attorney did not receive until January 10th because he was out of town on January 9th.

4. That Staff just responded at 4:18 p.m. today with a revised draft that counsel has not had time to review due to the need to prepare this motion and also his need to appear in court this evening.

5. That Complainant's attorney has advised the other parties that he needed additional time but has not heard back yet.

6. That due to a lack of time to get all the parties together by the end of the day today in order to reach a joint stipulation, Complainant respectfully requests an extension of time to at least January 18th and preferably January 19th to give the parties adequate time to comply.

7. That pursuant to 4 CSR 240-2.080(16), since the filing is due tomorrow, Complainant requests that the Commission grant this motion on an expedited basis. There should be no harm to any party or the general public if the Commission acts on this motion by tomorrow the date the Stipulation is due.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.,

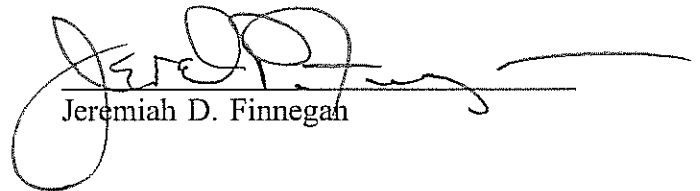
By: 

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ATTORNEYS FOR BRIARCLIFF  
DEVELOPMENT COMPANY

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been mailed, hand-delivered, faxed or electronically mailed to all counsel of record this 10th day of January, 2012.



Jeremiah D. Finnegan