

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

In the Matter of an Examination of Class)	
Cost of Service and Rate Design in the)	
Missouri Jurisdictional Electric Service)	Case No. EO-2002-384
Operations of Aquila, Inc., Formerly)	
Known as UtiliCorp United Inc.)	

**STAFF'S MOTION FOR LEAVE TO LATE FILE RESPONSE TO
SIEUA AND FEA'S JOINT MOTION FOR PROCEDURAL SCHEDULE**

Comes now the Staff of the Missouri Public Service Commission and for its Motion for Leave to Late File Response to SIEUA and FEA's Joint Motion for Procedural Schedule states:

1. SIEUA and FEA filed their Joint Motion for Procedural Schedule on July 8, 2005.
2. While the Staff has worked on preparing a response and alternative proposals, due to the press of other matters, including participation in finalizing proposed procedural schedules in Aquila's pending general rate increase cases for electric and steam heating service, Case Nos. ER-2005-0436 and HR-2005-0450, the Staff has been unable to finalize its response within the time allotted by Commission rule for filing responses to motions.
3. While the Staff anticipated that an extension of two days to prepare and file its response would be adequate, (1) because the undersigned counsel was conducting depositions as part of an informal investigation of Cass County Telephone Company, New Florence Telephone Company and the impacts of actions of Kenneth Matzdorff on Missouri consumers on Tuesday, July 19 and Wednesday, July 20, 2005 and (2) the workload of other counsel in the employ of

the Commission was such that they were unable to finalize a response, the Staff was unable to finalize its response until today.

4. This motion is not being filed to work hardship on any party nor to delay this case going forward.

WHEREFORE, for good cause shown, the Staff requests leave to late file its response to the joint motion of SIEUA and FEA.

Respectfully submitted,

DANA K. JOYCE
General Counsel

/s/ Nathan Williams

Nathan Williams
Senior Counsel
Missouri Bar No. 35512

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 21st day of July 2005.

/s/ Nathan Williams