

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

In the Matter of the Exploration of a Joint)
Proceeding with the Kansas Corporation)
Commission to Investigate the Off-System)
Sales Allocation Methods of Kansas City)
Power & Light Company)

File No. EO-2012-0020

REQUEST FOR ADDITIONAL TIME

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), through the Staff Counsel's Office, and hereby requests three (3) days' additional time to respond to the Commission's July 22, 2011, *Order Directing Filing* ("Order").

In support of this request, the Staff states as follows:

1. In its *Order*, the Commission directed, *inter alia*, that:
 3. The parties are invited to file pleadings discussing the above-referenced issue or other issues connected to the jurisdictional allocation and whether they believe a joint proceeding between this Commission and the Kansas Corporation Commission, would be constructive in resolving the non-firm off system sales issue as described above.
 4. The parties are also invited to provide proposals on how the Commissions should handle a joint proceeding.
 5. The Staff of the Commission shall identify any other potential issues for inquiry.
 6. Pleadings shall be filed no later than August 8, 2011.
2. Undersigned Staff counsel has endeavored to stay current with several cases now pending before the Commission with concurrent deadlines, as well as various matters that are not currently docketed in EFIS, and requires additional time for the filing of the Staff's response.
3. Undersigned Staff counsel anticipates being able to file the Staff's responsive pleading as described above by August 11, 2011, and requests until August 11, 2011, to do so.

4. Staff does not request this additional time to unduly delay these proceedings or inconvenience the Commissioners, Regulatory Law Judges, Kansas City Power & Light Company, the Office of the Public Counsel, or any other possible parties. Undersigned Staff counsel apologizes for any inconvenience occasioned by the requested delay.

WHEREFORE, the Staff hereby requests three (3) days' additional time to file the Staff's responsive pleading as described in the Commission's July 22, 2011, *Order Directing Filing*.

Respectfully submitted,

/s/ Steven Dottheim

Steven Dottheim
Chief Deputy Staff Counsel
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to all counsel of record this 5th day of August, 2011.

/s/ Steven Dottheim

Steven Dottheim