

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

In the Matter of the Third Prudence Review of)
Costs Subject to the Commission-Approved Fuel)
Adjustment Clause of KCP&L Greater Missouri)
Operations Company.)

Case No. EO-2011-0390

STAFF’S MOTION FOR LEAVE TO FILE LATE

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its Motion for Leave to File Late its Third Prudence Audit Report, respectfully states to the Missouri Public Service Commission (“Commission”) as follows:

1. The Staff has conducted a prudence review of the costs and revenues associated with GMO’s FAC for the period June 1, 2009 to November 30, 2010.¹

2. Rule 4 CSR 240-20.090(7)(B), in part, provides: “The Staff shall file notice within ten (10) days of starting its prudence audit.” It also establishes the following schedule by which certain events are to take place based on the date the Staff starts its prudence audit:

Time from start of Staff prudence audit to event	Event
Within 180 days	Submission of Staff recommendation to Commission regarding Staff’s examination and analysis
Within 190 days	Request for hearing
Within 210 days	Commission Order, if no hearing requested

3. The Staff initiated its prudence audit of the costs and revenues associated with GMO’s commission-approved FAC on June 1, 2011.

¹ The Staff notes rate adjustments based on the June 2008 to November 2008 and December 2008 to May 2009 accumulation periods were the subjects of Case Nos. EO-2009-0254 and EO-2010-0002, respectively.

4. The Staff planned to file its recommendation to the Commission regarding the Staff's examination and analysis in this case by November 28, 2011; however, due to the press of other business it is unable to do so.

WHEREFORE, the Staff of the Missouri Public Service Commission hereby moves the Commission for relief from the requirement of Rule 4 CSR 240-20.090(7)(B) that its prudence audit report for the audit period of June 1, 2009, through November 30, 2010, be filed 180 days from when it started its audit, and allow the Staff leave to file its report on the 181st day, November 29, 2011, instead.

Respectfully submitted,

/s/ Nathan Williams

Nathan Williams
Deputy Counsel
Missouri Bar No. 35512

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8702 (Telephone)
(573) 751-9285 (Fax)
nathan.williams@psc.mo.gov (e-mail)

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 28th day of November, 2011.

/s/ Nathan Williams