BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| In the Matter of the Joint Application of Great |) | |
|--|---|-----------------------|
| Plains Energy Incorporated, Kansas City Power |) | Case No. EM-2007-0374 |
| & Light Company, and Aquila, Inc. for Approval |) | |
| of the Merger of Aquila, Inc. with a subsidiary of |) | |
| Great Plains Energy Incorporated and for Other |) | |
| Related Relief. |) | |

MOTION FOR EXTENSION OF TIME TO FILE PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW AND REQUEST FOR EXPEDITED TREATMENT

COMES NOW the Staff of the Missouri Public Service Commission (Staff), the Office of the Public Counsel (Public Counsel), and Praxair, Inc. (Praxair), AG Processing, Inc. (AGP) and Sedalia Industrial Energy Users' Association (SIEUA) (Praxair, AGP and SIEUA collectively referred to as Industrial Intervenors) and jointly request an extension of time to June 13, 2008 to file Proposed Findings Of Fact And Conclusions Of Law and request expedited treatment, pursuant to 4 CSR 240-2.080(16). In support thereof, the Staff, Public Counsel, and Industrial Intervenors state as follows:

- 1. On March 11, 2008 the Commission issued a Second Order Adopting Procedural Schedule in which it set June 2, 2008 as the date for Posthearing Briefs and Proposed Findings Of Fact And Conclusions Of Law.
- 2. The Staff, Public Counsel and Industrial Intervenors had sought to meet the above schedule set by the Commission mindful that evidentiary hearings in The Empire District Electric Company electric rate case (Case No. ER-2008-0093)¹ were planned to continue into the week of May 19, 2008 amidst various other Commission cases requiring the attention of counsel for these parties.

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¹ Undersigned counsel for the Staff is not working on Case No. ER-2008-0093, although Mr. Dottheim is doing so.

3. The demands which that and other Commission cases have exercised upon counsel for the Staff, Public Counsel, and Industrial Intervenors now require that they request an extension of time for the filing of the Proposed Findings Of Fact And Conclusions Of Law set by the Commission, as it is no longer realistic that counsel will be able to provide that document in addition to Posthearing Briefs on June 2, 2008. Counsel for the Staff, Public Counsel, and Industrial Intervenors do not lightly make this request and do not do so to delay these proceedings.

4. If other parties are in a position to file their Proposed Findings Of Fact And Conclusions Of Law on June 2, 2008 and desire to do so, the Commission granting an extension of time for the filing of Proposed Findings Of Fact And Conclusions Of Law should not prevent other parties from filing on June 2, 2008. There should be nothing new or different in a party's Proposed Findings Of Fact And Conclusions Of Law that is not in the party's Prehearing Brief or Posthearing Brief so there should be no disadvantage for a party filing earlier than others, if it desires to do so.

WHEREFORE the Staff, Public Counsel, and Industrial Intervenors jointly request an extension of time to June 13, 2008 to file Proposed Findings Of Fact And Conclusions Of Law and request expedited treatment, pursuant to 4 CSR 240-2.080(16).

Respectfully submitted,

/s/ Kevin A. Thompson

KEVIN A. THOMPSON General Counsel Mo. Bar No. 36288 573-751-6514 (Voice) 573-526-6969 (Fax) kevin.thompson@psc.mo.gov

Steven Dottheim Chief Deputy General Counsel

Mo. Bar No. 29149 573-751-7489 (Voice) 573-751-9285 (Fax) steve.dottheim@psc.mo.gov

Attorneys for the Staff of the Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102

/s/ Lewis R. Mills, Jr. LEWIS R. MILLS, JR. Public Counsel Mo. Bar No. 35275 573-751-1304 (Voice) 573-751-5562 (Fax) lewis.mills@ded.mo.gov

Office of the Public Counsel P.O. Box 2230 Jefferson City, Missouri 65102

/s/ Stuart W. Conrad STUART W. CONRAD Mo. Bar No. 23966 3100 Broadway, Suite 1209 Kansas City, Missouri 64111 816-753-1122 (Voice) 816-756-0373 (Fax) stucon@fcplaw.com

Counsel for Sedalia Energy Users' Association AG Processing, Inc. Praxair, Inc.

Certificate Of Service

I hereby certify that a true and correct copy of the foregoing has been mailed, hand-delivered, transmitted by facsimile or electronically served to all counsel of record this 27th day of May, 2008.

/s/ Kevin A. Thompson