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 EXTENSION OF TIME TO 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 Extension of Time to 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. As the Staff will explain in its response, parts of the schedule proposed by SIEUA and FEA would work grave hardship on the Staff.
- 4. This motion is not being filed to work hardship on any party nor to delay this case going forward.

5. Out of caution, the Staff requests for two additional days to file its response and alternative proposals.

WHEREFORE, for good cause shown, the Staff requests two additional days, until July 20, 2005 to 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

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

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronic mail to all counsel of record this 18th day of July 2005.

/s/ Nathan Williams