

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

Joint Application of Kansas City Power &)
Light Company, KCP&L Greater Missouri)
Operations Company and The Empire)
District Electric Company for Authority to)
Enter Into Certain Leases and Agreements)
Regarding Existing Common Facilities at)
the Iatan Generating Station)

File No. EO-2012-0015

**STAFF'S MOTION FOR EXTENSION OF TIME
TO FILE STAFF'S RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through the undersigned counsel, and on the Staff's behalf files this Motion for an extension of time to file the Staff's recommendation and states as follows:

1. On April 11, 2011, in File No. EO-2011-0334, Kansas City Power & Light Company ("KCPL") filed a Notice Of Intended Case Filing pursuant to 4 CSR 240-4.020 stating that it intended to file an application pursuant to Section 393.190 for (1) approval of the transfer of existing common facilities located at the Iatan Generating Station to the Kansas Electric Power Cooperative, Inc. ("KEPCo") and the Missouri Joint Municipal Electric Utility Commission ("MJMEUC"); (2) approval of the transfer of interests in permits to other owners of the new Iatan Unit 2 electric generating facility ("Unit 2"); (3) approval to enter into the Unit 2 Site lease; and (4) approval, if deemed necessary, for the sale of an interest in utility property to KEPCo and MJMEUC.

2. On July 15, 2011, in File No. EO-2012-0015, The Empire District Electric Company ("Empire") filed Empire's Notice Of Intended Case Filing pursuant to 4 CSR 240-4.020. Empire made note of the April 11, 2011 filing of KCPL in File No. EO-2011-0334, and stated that as a joint owner of the Iatan facilities,

Empire will be joining in the Application to be made by KCPL and will be requesting approval from the Commission to enter into the Unit 2 Site lease agreement.

3. On March 9, 2012, in File No. EO-2011-0334, KCPL filed an Application pursuant to 4 CSR 240-2.060 and 4 CSR 240.3110 for (1) approval of the transfer of existing common facilities located at the Iatan Generating Station to the Kansas Electric Power Cooperative, Inc. ("KEPCo") and the Missouri Joint Municipal Electric Utility Commission ("MJMEUC"); (2) approval of the transfer of interests in permits to other owners of the new Iatan Unit 2 electric generating facility ("Unit 2"); and (3) approval, if deemed necessary, for the sale of an interest in utility materials and supplies inventory to KEPCo and MJMEUC.

4. On March 9, 2012, in File No. EO-2012-0015, KCPL, KCP&L Greater Missouri Operations Company ("GMO"), and Empire filed a Joint Application pursuant to 4 CSR 240-2.060 and 4 CSR 240.3110 for the approval of (1) Unit 1 owners (KCPL, GMO, and Empire) to lease, and grant easements over, portions of the Initial Iatan Station Site to the Unit 2 owners (KCPL, GMO, MJMEUC, and KEPCo) covering Unit 2 and the Common Facilities, pursuant to Section 393.190.1 RSMo., and (2) the leasing of the Nower Property by KCPL to the other Unit 1 and Unit 2 owners for the landfill portion of the Common Facilities.

5. On March 14, 2012, the Commission issued an Order Directing Notice Of Application And Order Directing Filing in File No. EO-2011-0334 and File No. EO-2012-0015 in which, among other things, the Commission directed the Staff to file its recommendation in File No. EO-2011-0334 and in File No. 2012-0015 no later than April 16, 2012.

6. The Staff is engaged in discovery in File No. EO-2011-0334 and File No. EO-2012-0015 but has not completed discovery, and, as a consequence, has not completed its analysis of the pending Application and Joint Application.

7. Therefore, the Staff requests an extension of time to Friday, June 1, 2012 to complete discovery and its analysis and file a recommendation in File No. EO-2011-0334 and File No. EO-2012-0015.

WHEREFORE, the Staff requests an extension of time to Friday, June 1, 2012 to complete discovery and its analysis, and file a recommendation in this proceeding.

Respectfully submitted,

/s/ Steven Dottheim

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing *Staff's Motion For Extension Of Time To File Staff's Recommendation* have been transmitted electronically to all counsel of record this 13th day of April, 2012.

/s/ Steven Dottheim