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

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)	Case No. EM-2007-0374
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## STAFF REQUEST FOR LEAVE TO LATE-FILE PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW

Comes now the Staff of the Missouri Public Service Commission (Staff) in response to the May 27, 2008 Order of the Missouri Public Service Commission (Commission), Granting Motion for Extension of Time to File Proposed Findings of Fact and Conclusions of Law until 4:00 pm, June 6, 2008. The Staff hereby requests leave to late-file the Proposed Findings of Fact and Conclusions of Law of the Staff and the Industrial Intervenors<sup>1</sup> after 4:00 pm, on June 6, 2008. In support of this request, the Staff states as follows:

- 1. The Staff, and in particular undersigned counsel, have endeavored to stay current with the procedural schedule set by the Commission in this matter. This effort places great demands on the Staff's resources at a time when there are many other cases (rate cases, rulemakings, financing applications, resource planning, appellate matter, etc.) pending before the Commission and elsewhere respecting the Commission.
- 2. The Staff does not request this leave to late-file the Proposed Findings of Fact and Conclusions of Law of the Staff and the Industrial Intervenors to unduly delay these proceedings or inconvenience the Commissioners, Regulatory Law Judges, Joint Applicants or any other

<sup>&</sup>lt;sup>1</sup> The Staff anticipates that the Office of the Public Counsel may file a letter with the Commission the week of June 9, 2008 joining in the Proposed Findings of Fact and Conclusions of Law of the Staff and the Industrial Interveners.

parties. Undersigned counsel apologizes for the inconvenience that this late filing has caused to date and/or may further cause.

**Wherefore,** the Staff hereby requests leave to late-file the Proposed Findings of Fact and Conclusions of Law of the Staff and the Industrial Intervenors, after 4:00 pm, on June 6, 2008.

Respectfully submitted,

## /s/ Steven Dottheim

Steven Dottheim Chief Deputy General Counsel Missouri Bar No. 29149

Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360
Jefferson City, MO 65102
(573) 751-7489 (Telephone)
(573) 751-9285 (Fax)
e-mail: steve.dottheim@psc.mo.gov

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 6th day of June, 2008.

/s/ Steven Dottheim

Steven Dottheim