

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

In the Matter of KCP&L Greater Missouri Operations)
Company's Application for Approval of Demand-) **Case No. EO-2012-0009**
Side Programs and for Authority to Establish a)
Demand-Side Programs Invest Mechanism)

**JOINT MOTION FOR EXTENSION OF TIME TO FILE A LIST OF ISSUES AND
STATEMENT OF POSITIONS**

COME NOW the Staff of the Missouri Public Service Commission ("Staff"), KCP&L Greater Missouri Operations Company (GMO), Missouri Department of Natural Resources (MDNR), the Office of the Public Counsel (OPC), Missouri Industrial Energy Consumers (MIEC), Sierra Club, Natural Resources Defense Council (NRDC), Renew Missouri, Sam's East, Inc. ("Sam's Club"), Wal-Mart Stores, Inc. ("Wal-Mart"), known collectively herein as "the Parties"¹, and files this *Motion For Extension Of Time To File a List of Issues, and Statement Of Positions (Motion)* with the Missouri Public Service Commission (Commission) and states as follows:

1. On April 11, 2012, the Commission issued an *Order Granting Motion to Modify Procedural Schedule*, by which the Commission ordered that the List of Issues be filed no later than May 11, 2012 and the Statements of Position be filed no later than May 16, 2012.

2. Due to the Parties continued settlement discussions, involvement in several MEEIA cases, at least three anticipated depositions in another MEEIA filing next week, and the necessary leave of the Staff's main witness, the Staff asks for additional

¹ "The Parties" do not represent all parties in this case as AGP, Ameren and MGE have not commented on this filing.

time to work with the Parties. Staff has submitted a draft issue list to the Parties for their review and comment.

3. The Parties anticipate filing a Joint List of Issues, Order of Witnesses and Order of Cross Examination no later than May 31, 2012, and Statements of Positions no later than June 6, 2012. If the Parties cannot reach an agreement, the Parties will file separate lists for the Commission's consideration.

WHEREFORE, the Staff files this *Motion* requesting the Commission extend the dates by which the Parties are to file a joint List of Issues and Position Statements, to the dates suggested by the Parties in this *Motion*.

Respectfully submitted,

/s/ Goldie Tompkins

Goldie Tompkins
Legal Counsel
Missouri Bar No. 58759

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751- 8700 (Telephone)
(573) 751-9285 (Fax)
goldie.tompkins@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been electronically mailed to all counsel of record this 11th day of May, 2012.

/s/ Goldie Tompkins