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

In the Matter of the Application of Transource Missouri, L.L.C. for a Certificate of Convenience and Necessity Authorizing it to Construct, Finance, Own, Operate, and Maintain the Iatan-Nashua and Sibley-Nebraska City Electric Transmission Projects	) ) ) )	<u>File No. EA-2013-0098</u>
In the Matter of the Application of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company for Approval to Transfer Certain Transmission Property to Transource Missouri, L.L.C. and for other Related Determinations	) ) ) )	<u>File No. EO-2012-0367</u>

## JOINT REQUEST FOR EXTENSION OF TIME FOR FILING JOINT STIPULATION OF NON-DISPUTED MATERIAL FACTS

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), by and through the Staff Counsel's Office, on behalf of the "Parties" in File Nos. EA-2013-0098 and EO-2012-0367, i.e., the Staff, the Office of the Public Counsel ("OPC"), Missouri Industrial Energy Consumers ("MIEC"),<sup>1</sup> and the Applicants Transource Missouri, LLC ("Transource Missouri"),<sup>2</sup> Kansas City Power & Light Company ("KCP&L"), and KCP&L Greater Missouri Operations Company ("GMO"),<sup>3</sup> and files this *Joint Request For Extension Of Time For Filing Joint Stipulation Of Non-Disputed Material Facts* from March 27, 2013 to after the evidentiary hearing scheduled for April 2-4, 2013. In support thereof, the Staff states as follows:

1. On March 19, 2013, the Commission at the request of the Parties issued an Order Modifying Procedural Schedule in which it moved the dates for the filing of the (i) List of Issues, Order of Witnesses, Order of Cross-Examination, Order of Opening Statements

<sup>&</sup>lt;sup>1</sup> MIEC is comprised of Bayer CropScience, Boehringer-Ingelheim, Corn Products, and Ford Motor Company.

<sup>&</sup>lt;sup>2</sup> Transource Missouri is the Applicant in File No. EA-2013-0098.

<sup>&</sup>lt;sup>3</sup> KCP&L and GMO are the Applicants in File No. EO-2012-0367.

from March 19 to March 26, 2013; (ii) Joint Stipulation of Non-Disputed Material Facts from March 20 to March 27, 2013; and (iii) Position Statements from March 21 to March 28, 2013.

2. Due to the time presently engaged in preparing the List of Issues, Order of Witnesses, Order of Cross-Examination, and Order of Opening Statements, and Position Statements, preparing for hearing, and engaging in settlement discussions, the Parties request an extension of time to file the Joint Stipulation of Non-Disputed Material Facts from March 27, 2013 to after the evidentiary hearing scheduled for April 2-4, 2013.

3. The Parties do not make this request to unduly delay the proceedings or vex the Commission.

WHEREFORE, the Staff on behalf of the Parties in File Nos. EA-2013-0098 and EO-2012-0367 files this *Joint Request For Extension Of Time For Filing Joint Stipulation Of Non-Disputed Material Facts* from March 27, 2013 to after the evidentiary hearing scheduled for April 2-4, 2013.

Respectfully submitted,

## <u>/s/ Steven Dottheim</u>

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing *Joint Request For Extension Of Time For Filing Joint Stipulation Of Non-Disputed Material Facts* have been transmitted electronically to all counsel of record this 26th day of March, 2013.

<u>/s/ Steven Dottheim</u>