

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

In the Matter of the Application of Kansas City)
Power & Light Company for Approval to Make)
Certain Changes in its Charges for Electric Service)
to Continue the Implementation of its Regulatory)
Plan.)

File No. ER-2010-0355
Tariff No. JE-2010-0692

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for)
Approval to Make Certain Changes in its Charges)
for Electric Service.)

File No. ER-2010-0356
Tariff No. JE-2010-0693

Staff's Motion to Extend Briefing Schedule

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and requests the Commission to extend the briefing schedule in these cases as follows:

1. Staff, Kansas City Power & Light Company, Praxair, Inc. and Missouri Energy Users' Association filed a *Nonunanimous Stipulation and Agreement/Proposed Procedural Schedule* on July 29, 2010 in which they proposed procedural schedules for both this case and the general electric rate increase case of KCP&L Greater Missouri Operations Company, File No. ER-2010-0356. In an order issued and effective August 18, 2010, the Commission adopted and ordered the proposed procedural schedules.

2. The procedural schedules included evidentiary hearings on issues specific to this case and issues in both cases during January 18 to February 4, 2011, on issues specific to File No. ER-2010-0356 on February 14 to February 18, 2011, followed by a true-up evidentiary hearing for both cases on March 3 and March 4, 2011. The procedural schedules provide that initial post-hearing briefs are to be filed on March 10, 2011, and reply briefs are to be filed on March 18, 2011.

3. The day after Staff, Kansas City Power & Light Company, Praxair, Inc. and Missouri Energy Users' Association proposed procedural schedules, on July 30, 2010, Ameren Missouri filed a notice opening File No. ER-2011-0028 in which it stated it planned to file a general electric rate increase case within the following sixty (60) days. Ameren Missouri filed its general electric rate increase case on September 3, 2010.

4. Similarly to Ameren Missouri's notice filing, but on July 7, 2010, before the procedural schedules were proposed in this case and in File No. ER-2010-0356, The Empire District Electric Company notified the Commission it intended to file a general electric rate increase case within sixty (60) days. It did so on September 28, 2010.

5. Among the significant changes have occurred that affect Staff's resources for briefing these cases since Staff joined in the agreement proposing a briefing schedule, and the Commission adopted and ordered it are the following:

- A. Staff attorney Eric Dearmont, who was assigned to and handling the issues of return on equity, cost of debt and other significant contested issues resigned—his last day was Wednesday, February 16, 2011;
- B. The technical/settlement conference in ER-2011-0028 was set for the week of February 28 to March 4, 2011;
- C. Staff negotiated and reached a stipulation of facts with Ameren Missouri filed March 3, 2011, in the contested case, ER-2011-0274, regarding true-up of the first accumulation period of its fuel adjustment clause; and
- D. Staff prepared and filed comments on March 1, 2011, in File No. EW-2011-0139 regarding the need for revisions to the Commission's fuel adjustment clause rules.

- E. Although true-up hearing dates are set for most rate cases, true-up hearings occur infrequently. True-up hearings did occur in File Nos. ER-2010-0355 and ER-2010-0356.
6. Because of these resource constraints Staff proposes the following short extension to the briefing schedule:

	File Nos. ER-2010-0355 & 0356	
	Current	Proposed
Advanced Coal Tax Credit Issue	Thu., March 10, 2011	Thu., March 10, 2011
Initial Posthearing Briefs	Thu., March 10, 2011	Tue., March 15, 2011
Reply Posthearing Briefs; True-up Briefs; and Proposed Findings of Fact / Conclusions of Law (optional)	Fri., March 18, 2011	Thu., March 24, 2011
Effective date of tariff sheets	ACTUAL Wed., May 4, 2011 (ER-2010-0355)	ACTUAL Sat., June 4, 2011 (ER-2010-0356)

WHEREFORE, Staff requests the Commission issue an order extending the briefing schedule in these cases as set forth above.

Respectfully submitted,

/s/ Nathan Williams

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 4th day of March 2011.

/s/ Nathan Williams