

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

<b>In the Matter of an Investigation into</b>	)	
<b>Southwest Power Pool Cost Allocations</b>	)	<b>File No. EO-2011-0134</b>
<b>and Cost Overruns</b>	)	

**STAFF REPORT AND REQUEST FOR LEAVE TO LATE-FILE**

Comes now the Staff of the Missouri Public Service Commission (Staff), by and through Staff Counsel's Office, and in response to the November 23, 2010 Commission Order Opening An Investigation Into Southwest Power Pool Cost Allocations And Cost Overruns files the January 3, 2011 Staff Report. The Commission directed the Staff to file a report respecting the costs and benefits of Southwest Power Pool (SPP) membership for The Empire District Electric Company and the report shall include an estimate of the costs of new transmission payments and benefits to EDE as a result of SPP's proposed Integrated Transmission Planning 20-Year Assessment (ITP20) as of December 15, 2010.

The Staff is filing the entirety of its Report as Highly Confidential in that due to the shortness of time to confer with the interested parties, the Staff has not been able to assess which of the information in the Report may be asserted to fall within the Commission's Rule 4 CSR 240-2.135 Confidential Information. The Staff requests that the interested parties timely advise the Staff what portions of the Staff Report they assert contain Highly Confidential and/or Proprietary information so that a non-proprietary / public version of the Staff Report can be filed.

The Commission directed the Staff to file its Report by December 31, 2010. Even though Commission Rule 4 CSR 240-2.050 Computation of Time permits a timely filing by January 3, 2011, the Staff is filing its Report on January 4, 2011. Undersigned Staff counsel apologizes for the late-filing and requests leave to late-file. The Staff has endeavored to meet the

Commission's prescribed filing date, but the demands of the numerous other Commission cases have proved daunting. The Staff does not late-file so as to unduly delay the Commission's proceedings. The Staff notes that it anticipates receiving additional information and will supplement its Report accordingly.

Wherefore the Staff files its Staff Report respecting the costs and benefits of Southwest Power Pool membership for The Empire District Electric Company, which report is to include an estimate of the costs of new transmission payments and benefits to EDE as a result of SPP's proposed ITP20 as of December 15, 2010.

Respectfully submitted,

/s/ Steven Dottheim  
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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 January, 2011.

/s/ Steven Dottheim