

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

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

STAFF RESPONSE TO MOTION FOR EXTENSION

Comes now the Staff of the Missouri Public Service Commission (Staff), by and through Staff Counsel's Office, and in response to the Motion For Extension of The Empire District Electric Company (Empire) states that the Staff has no objection to the requested extensions of Empire so long as the Commission itself has no objection to Empire's requested extensions of time for filings. In support thereof, the Staff states as follows:

1. Counsel for Empire did attempt to contact the undersigned Staff counsel on February 3, 2011 to determine whether the Staff had any objection to Empire's intended request for extensions of the remaining filing dates in this docket. Undersigned Staff counsel called counsel for Empire and was not able to talk with him. The press of attempting to prepare the Staff's cost of service revenue requirement direct case for filing in File No. ER-2011-0028, the general electric rate increase filing of Union Electric Company, d/b/a Ameren Missouri, and the ongoing Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company general electric rate increase cases prevented the undersigned Staff counsel from catching up and talking with counsel for Empire on February 3, 2011.

2. The Commission in its November 23, 2010 Order Opening An Investigation Into Southwest Power Pool Cost Allocations And Cost Overruns indicated that it had time constraints that it was operating under. Given the Commission's time constraints, the Staff has no objection

to the extensions requested by Empire so long as the Commission itself has no objection to Empire's requested extensions for filing dates.

3. As a general matter and as a matter of course, the Staff attempts to extend common courtesies to other parties and hopes that it will be shown like treatment. The Staff will note what the Commission and Empire already know. Yesterday, undersigned Staff counsel filed a Motion for extension of time for the filing of cost of service revenue requirement direct cases / prepared direct testimony and schedules in File No. ER-2011-0028. The Staff has no interest in objecting to Empire's request for extensions of time for the filings addressed in Empire's Motion.

Wherefore the Staff submits its response to Empire's Motion For Extension of dates for filings and states that given what the Commission determines are its time constraints, the Staff has no objection to Empire's requested extensions so long as the Commission itself has no objection to Empire's request for extensions.

Respectfully submitted,

/s/ Steven Dottheim
Steven Dottheim
Chief Deputy Staff Counsel
Missouri Bar No. 29149
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
steve.dottheim@psc.mo.gov
573-751-7489 (Telephone)
573-751-9285 (Fax)

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 February, 2011.

/s/ Steven Dottheim