BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Nickie)		
Hertzog for a Change of Electric Supplier)	Case No.	EO-2012-0343

STAFF'S MOTION FOR EXTENSION OF TIME TO FILE STAFF'S REPORT

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through the undersigned counsel, and files this *Motion for Extension of Time to File Staff's Report*, regarding the Application filed by Nickie Hertzog with the Missouri Public Service Commission ("Commission") requesting a change in supplier from Osage Valley Electric Cooperative ("Osage Valley") to Kansas City Power and Light ("KCPL"), and states as follows:

- 1. On May 23, Staff filed *Staff's Request for Extension of Time to File Staff's Report* to allow Staff the opportunity to review Osage Valley's response to the Application as well as Nickie Hertzog's response to Osage Valley's data requests.
- 2. On May 24, 2012, the Commission issued an *Order Granting Staff's Request for Extension of Time to File Staff's Report*, thereby extending the date by which Staff must file Staff's Recommendation to July 30, 2012.
- 3. Staff's expert witness in this case has attempted to contact Ms. Hertzog to obtain additional information but has been unable to do so. Due to the press of other business and the need to consider additional information related to Ms. Hertzog's case, Staff requests additional time to contact Ms. Hertzog and finalize Staff's Recommendation. Staff anticipates filing its response the week of August 6, 2012.

- 4. Counsel for Staff has contacted the attorneys for the Office of the Public Counsel ("OPC"), KCPL and Osage Valley regarding Staff's Motion for additional time.

 OPC, KCPL and Osage Valley do not oppose this Motion.
- 5. Counsel for Staff has attempted to contact Ms. Hertzog regarding the same but was unable to do so in time for this filing.
 - 6. No one will be prejudiced by the Commission granting this request.

WHEREFORE, the Staff respectfully requests that the Commission issue an order granting Staff an extension of time, until August 7, 2012 to file its status report or recommendation in this case.

Respectfully submitted,

/s/ Lera L. Shemwell

Lera L. Shemwell Deputy General Counsel Missouri Bar No. 43792

Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360
Jefferson City, MO 65102
(573) 751-7431 (Telephone)
(573) 751-9285 (Fax)
lera.shemwell@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed, sent by facsimile or hand-delivered to all counsel of record this 30th day of July, 2012.

/s/ Lera L. Shemwell