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

In the Matter of the Tariff Filing of KCP&L	)	
Greater Missouri Operations Company, to	)	
Implement a General Rate Increase for Retail	)	
Electric Service Provided to Customers in its	)	Case No. ER-2009-0090
Missouri Service Areas it formerly served as	)	Tariff No. JE-2009-0913
Aquila Networks—MPS and Aquila Networks—	)	
L&P.	)	

# JOINT MOTION FOR ADDITIONAL TIME TO FILE STIPULATION AND AGREEMENT

**COME NOW** the Staff of the Missouri Public Service Commission ("Staff") and KCP&L Greater Missouri Operations Company ("GMO") and, for their Joint Motion for Additional Time to File a Stipulation and Agreement, state:

- 1. On May 11, 2009 parties in this case advised the Commission a settlement in principle had been reached that they believed obviated the need for the evidentiary hearing in this case to proceed that was scheduled to begin on that date. In response, the Commission issued on May 11, 2009 its *Notice and Order Suspending Evidentiary Hearing, Setting Deadlines for Filings, and Setting Deadline for Requesting a Hearing* where the Commission, among other things, ordered GMO "along with its joint signatories" to file by May 15, 2009, "a stipulation and agreement memorializing any settled issues in this matter and the terms of the settlement."
- 2. While GMO and the anticipated joint signatories have diligently worked on finalizing a stipulation and agreement to file by the ordered date of May 15, 2009, they intend to file the entirety of their agreement, including a complete set of exemplar tariff sheets designed to implement the agreement.

3. While much progress has been made in achieving a final stipulation and agreement, and GMO has provided tariff sheets it believes comport with the settlement principles, the Staff anticipates it will not be able to complete its review before Tuesday, May 19, 2009, and that other joint signatories will not complete their review until some time thereafter. Further, in addition to discussion and review of exemplar tariff sheets, there is still discussion and review of certain other provisions of the stipulation and agreement. Therefore, the Staff and GMO request the Commission extend both the date by which the Stipulation and Agreement is to be filed by one week to Friday, May 22, 2009 and concomitantly extend the date for any non-signatories to object by one week to May 29, 2009.

**WHEREFORE,** the Staff and KCP&L Greater Missouri Operations Company jointly move the Commission to extend both the date by which the Stipulation and Agreement is to be filed by one week to Friday, May 22, 2009 and concomitantly extend the date for any non-signatories to object by one week to May 29, 2009.

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 emailed to all counsel of record this 15<sup>th</sup> day of May 2009.

/s/ Nathan Williams