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

In the Matter of the 2009 Resource Plan of	)	
KCP&L Greater Missouri Operations	)	File No. EE-2009-0237
Company Pursuant to 4 CSR 240-22.	)	

## KCP&L GREATER MISSOURI OPERATIONS COMPANY'S MOTION FOR EXTENSION OF TIME TO SUBMIT REVISED IRP FILING

Pursuant to Missouri Public Service Commission ("Commission") Rule 4 CSR 240-22.080(12), KCP&L Greater Missouri Operations Company ("GMO" or "Company") hereby respectfully submits its Motion for an extension of time until January 18, 2011, to file a revised Integrated Resource Planning Filing ("IRP") in accordance with the Non-Unanimous Stipulation & Agreement approved by the Commission on June 2, 2010. In support of its Motion, GMO respectfully states as follows:

- 1. On August 5, 2009, GMO filed its 2009 IRP which is required by the Commission's 4 CSR 240-22 rules.
- 2. On April 12, 2010, the Commission Staff, Public Counsel, Dogwood Energy, L.L.C. ("Dogwood"), the Missouri Department of Natural Resources ("MDNR") and GMO (collectively, "Signatory Parties") filed a Non-Unanimous Stipulation & Agreement ("Stipulation and Agreement") that contained a schedule of meetings and filings which addressed concerns and alleged deficiencies with GMO's IRP August 5, 2009 filing.
- 3. On June 2, 2010 the Commission issued its "Order Approving Nonunanimous Stipulation and Agreement and Accepting Integrated Resource Plan," wherein the Commission approved the Stipulation and Agreement and directed KCP&L to file its revised IRP no later than December 17, 2010.

4. Since that time, the Signatory Parties have participated in multiple meetings and filings ultimately working toward the anticipated December 17<sup>th</sup>, 2010 filing.

5. GMO has been working diligently toward the production of the revised IRP,

but finds that it cannot complete the required analysis by the current filing date due to

resource constraints. Key personnel necessary to this effort are also required for rate case

support. The analysis requires considerable time and resources, and GMO has not been able

to complete such analysis within the specified time-frame. GMO respectfully submits that

good cause exists for granting the relief requested herein.

WHEREFORE, KCP&L Greater Missouri Operations Company respectfully

requests that the deadline for filing its revised Integrated Resource Plan be extended to

January 18, 2011.

Respectfully submitted,

/s/ Larry W. Dority

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**Operations Company** 

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, electronic mail or hand delivery, on this 17th day of December, 2010 to the parties of record.

/s/ Larry W. Dority
Larry W. Dority