

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

In the Matter of a Proposed Experimental	)	
Regulatory Plan of Kansas City Power &	)	Case No. EO-2005-0329
Light Company	)	

**RESPONSE OF THE EMPIRE DISTRICT ELECTRIC COMPANY  
IN OPPOSITION TO SIERRA CLUB AND CONCERNED CITIZENS  
OF PLATTE COUNTY'S MOTION TO ALLOW FOR MORE TIME FOR FILING  
THE LIST OF ISSUES AND POSITION STATEMENT AND TO  
CONTINUE THE HEARING**

COMES NOW The Empire District Electric Company ("Empire"), by counsel, and for its Response to Sierra Club And Concerned Citizens Of Platte County's Motion to Allow for More Time for Filing the List of Issues and Position Statement and to Continue the Hearing ("Motion") respectfully states as follows to the Missouri Public Service Commission ("Commission"):

1. Empire opposes the Motion and requests that the Commission deny same for the reasons stated in the response to the Motion filed by Kansas City Power & Light Company ("KCPL") on May 25, 2005.
2. Additionally, Empire would note that it is a potential partner in the proposed Iatan 2 plant and the building of that plant, and thus Empire's participation in same, is dependent upon the outcome of the captioned-case. As indicated by KCPL's response, Empire, as a potential partner in the Iatan 2 plant, must demonstrate that it has a commercially feasible financing plan to participate in said plant by securing Commission approval of its financing plan. Empire's Iatan 2 financing plan is the subject of its Commission Case No. EO-2005-0263. It is important, therefore, that the Commission move forward expeditiously in both

the captioned-proceeding as well as Case No. EO-2005-0263 so that the construction schedule of latan 2 will not be delayed.

WHEREFORE, for the reasons set forth herein, Empire respectfully requests that the Commission deny the Motion.

Respectfully submitted,

Dean L. Cooper by jef

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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 or by hand delivery, on this 26<sup>th</sup> day of May, 2005 to all parties of record.

Dean L. Cooper by jef