

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

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(16) Consideration)
of Smart Grid Investments Standard as Required) **Case No. EW-2009-0290**
by Section 1307 of the Energy Independence and)
Security Act of 2007.)

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(16) Integrated)
Resource Planning Standard as Required by) **Case No. EW-2009-0291**
Section 532 of the Energy Independence and)
Security Act of 2007.)

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(17) Rate Design)
Modifications to Promote Energy Efficiency) **Case No. EW-2009-0292**
Investments Standard as Required by Section)
532 of the Energy Independence and Security)
Act of 2007.)

STAFF’S MOTION FOR EXTENSION OF TIME TO FILE REPORT

Comes now the Staff of the Missouri Public Service Commission (“Staff”) through the Office of the General Counsel of the Missouri Public Service Commission (“Commission”) and in response to ordered paragraph five of the Commission’s May 6, 2009 *Order Consolidating Workshops, Consolidating Cases and Correcting File Captioning*, states:

1. In Ordered paragraph 4. of its *Order Consolidating Workshops, Consolidating Cases and Correcting File Captioning* the Commission stated:

The workshops for files numbers EW-2009-0290, EW-2009-0291, and EW-2009-0292 shall be consolidated with the current workshops schedules for the review of the Commission’s Integrated Resource Planning Rules. The current schedule for those workshops consists of three, two-day workshops: May 18-19, 2009; June 29-30, 2009, and a final session shall be schedule for late July or Early August of 2009,

and in Ordered paragraph 5., the Commission directed,

No later than July 31, 2009, the Staff of the Missouri Public Service Commission shall file a report describing the progress of the workshops and a recommendation as to whether any of the PURPA files should be addressed in workshop settings separate from the Integrated Resource Planning Rules Workshops.

2. The final workshop session for the Commission's Chapter 22 resource planning rules referenced in Ordered paragraph 4. to be held in late July or early August of 2009 was originally scheduled for July 30 and 31, 2009. After the workshop held on June 29 and 30, 2009, the Staff changed the format for the July 30 and 31, 2009 workshop in the hope of facilitating a more robust exchange of ideas before preparing the next draft of the proposed revision of the Chapter 22 rules which will be discussed at the final two-day workshop which has been scheduled for September 14 and 15, 2009. Participants / stakeholders have been invited to make presentations at this week's workshop, which is being held today and tomorrow, Thursday and Friday, July 30 and 31, in the hope that this approach will assist communications and make the process as open and transparent as possible.

3. The Staff believes it will be able to provide the Commission with a more meaningful "report describing the progress of the workshops and a recommendation as to whether any of the PURPA files should be addressed in workshop settings separate from the Integrated Resource Planning Rules Workshops" if the Commission extends the deadline for filing the report from July 31, 2009 to September 17, 2009. Extending the deadline for filing the report to September 17, 2009 will provide the Staff with sufficient time to include in its report an evaluation of progress made through the September 14 and 15 workshop when presenting a recommendation to the Commission as to whether any of the PURPA files (EW-2009-0290, EW-2009-0291, or EW-2009-0292) should be addressed in workshop settings separate from the Chapter 22 Resource Planning Rules workshops, which are scheduled to end on September 15.

Wherefore, the Staff moves the Commission to extend from July 31, 2009 to September 17, 2009, the deadline by which the Staff is to “file a report describing the progress of the workshops and a recommendation as to whether any of the PURPA files should be addressed in workshop settings separate from the Integrated Resource Planning Rules Workshops.”

Respectfully submitted,

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record and individuals and entities on the Staff’s electronic mail list of interested individuals and entities this 30th day of July 2009.

/s/ Steven Dottheim