

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

In the Matter of the Tariff Filing of The Empire )	
District Electric Company to Implement a General )	Case No. ER-2006-0315
Rate Increase for Retail Electric Service Provided )	
to Customers in its Missouri Service Area. )	

**REQUEST FOR ADDITIONAL TIME TO FILE PRELIMINARY RECONCILIATION**

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and respectfully states as follows:

1. The procedural schedule currently in effect in this proceeding calls for the filing of a preliminary reconciliation by June 30, 2006.
2. At the present time, The Empire District Electric Company ("Empire") is in the process of updating its case to reflect the Commission-ordered test year and update period. The Staff believes it is appropriate to reflect the results of this process in the preliminary reconciliation so that apparent test year differences among the parties' filed cases can be eliminated from the document. This will allow the filed reconciliation to be more relevant and concise.
3. Empire believes it can provide the Staff with updated numbers by the end of this week; however, this will not allow time for the Staff to prepare a reconciliation on an "apples to apples" test year basis. A delay in the filing deadline of the preliminary reconciliation until July 6, 2006 should permit the Staff to reflect Empire's updated numbers and thereby produce a more meaningful document. A delay of a few days in the filing time will also enable the Staff to elicit feedback from the parties prior to the filing. Further, a July 6 filing will still be timely, since the purpose of the preliminary reconciliation is to provide the parties with information concerning

the magnitude of outstanding issues prior to the settlement conference, which is currently scheduled for the week of July 10.

4. Counsel for the parties have been consulted, and no party objects to this request.

WHEREFORE, THE Staff respectfully requests that the Commission grant additional time, until July 6, 2006, for the filing of the preliminary reconciliation in this proceeding.

Respectfully submitted,

**/s/ Dennis L. Frey**

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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 this 29th day of June 2006.

**/s/ Dennis L. Frey**