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July 15, 2003

**VIA HAND DELIVERY**

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Judge  
Missouri Public Service Commission  
PO Box 360  
Jefferson City, MO 65102

**FILED<sup>2</sup>**  
**JUL 15 2003**  
**Missouri Public  
Service Commission**

Re: In the matter of the 2002 Annual Report of Trigen-Kansas City Energy  
Corporation  
Case No. HE-2003-0412

Dear Mr. Roberts:

Enclosed for filing with the Commission are the original and eight copies of a  
**Motion for Further Extension of Time to File 2002 Annual Report** in the above  
matter.

If you have any questions concerning this filing, please contact me.

Very truly yours,

LATHROP & GAGE L.C.

By:   
Paul S. DeFord

PD/jf  
Enclosures  
cc: PSC General Counsel  
Office of Public Counsel

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

In the matter of the 2002 Annual Report of )  
Trigen-Kansas City Energy Corporation )

Case No. HE-2003-0412

**FILED<sup>2</sup>**  
JUL 15 2003  
Missouri Public  
Service Commission

**MOTION FOR FURTHER EXTENSION OF TIME  
TO FILE 2002 ANNUAL REPORT**

COMES NOW Trigen-Kansas City Energy Corporation ("Trigen"), by and through counsel, pursuant to 4 CSR 240-2.015 and 4 CSR 240-3.015 (to the extent applicable), and for its Motion for Further Extension of Time to File 2002 Annual Report respectfully states as follows:

1. On April 7, 2003, Trigen filed a Motion for Extension of Time to File 2002 Annual Report in which it requested an extension until June 2, 2003 to file its 2002 Annual Report. On or about April 17, 2003, Staff filed its recommendation in this case in which Staff concluded that Trigen had demonstrated good cause for an extension and recommended that Trigen's request be granted, but that Trigen be ordered to submit supplemental pages 1 and 2 of the annual report form by May 15, 2003. Thereafter, on May 13, 2003, the Commission issued an order granting Trigen an extension until June 2, 2003 to file its annual report, subject to Staff's recommendation regarding the filing of supplemental pages 1 and 2. Trigen has since filed supplemental pages 1 and 2.

2. Thereafter, on May 29, 2003, Trigen filed a Motion for Further Extension of Time to File 2002 Annual Report, when it had become clear that Trigen would be unable to meet the June 2, 2003 filing date. On May 30, 2003, Staff filed its recommendation, in which Staff concluded that Trigen had stated good cause for the

further extension. On June 4, 2003, the Commission issued an order granting Trigen an extension of time until July 1, 2003 in which to file its annual report.

3. In late June, Trigen sought and was granted an additional extension until July 15, 2003 to file its annual report.

4. As stated previously, Trigen is investigating the need for potential adjustments to certain of its records and accounts, and completion of the investigation has been delayed due to the reorganization of administrative functions and the recent relocation of accounting personnel and records. Unfortunately, however, the process of investigating the need for potential adjustments to its records and accounts, including its property records and depreciation reserve accounts, and then making the appropriate adjustments, has taken longer than anticipated, due in part to the small size of Trigen's staff in comparison to many utilities regulated by the Commission.

5. Trigen has at all times continued to endeavor in good faith to comply with the prior Staff recommendations and Commission orders extending the filing date, as evidenced by its submission of supplemental pages 1 and 2 of the annual report. However, it has again become apparent that Trigen will be unable to meet the July 15, 2003 filing date for the reasons which have necessitated the previous extensions -- the continuing process of investigating the need for potential adjustments to its records and accounts and then making the appropriate adjustments pursuant to such investigation have taken longer than anticipated given its small staff, reorganization of administrative functions and recent relocation of personnel and records; at this time Trigen believes that it will need until August 15, 2003 to properly file its annual report given the need to complete its investigation and make any associated adjustments. Rather than allow the

July 15 deadline to pass without a filing, Trigen is making this filing at this time, and submits that it has shown good cause for a further extension of time to August 15, 2003 to file its 2002 Annual Report.

WHEREFORE, Trigen respectfully moves the Commission to grant this Motion for Further Extension of Time to File 2002 Annual Report and requests the Commission issue an order which grants Trigen until August 15, 2003 to file its annual report.

Respectfully submitted,

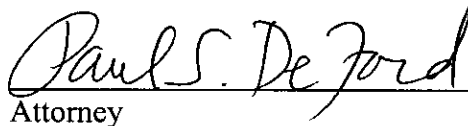


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ATTORNEYS FOR TRIGEN-KANSAS  
CITY ENERGY CORPORATION

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served by placing same in first-class mail, postage prepaid, or by hand-delivery, to the Missouri Public Service Commission's General Counsel's Office and the Office of the Public Counsel on this 15th day of July, 2003.

  
Attorney