

**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.)

**MOTION TO LATE-FILE SECTION OF STAFF'S PREHEARING BRIEF
ON EXPERIMENTAL LOW-INCOME PROGRAM
AND DEMAND SIDE MANAGEMENT PROGRAMS**

Comes now the Staff of the Missouri Public Service Commission (Staff) and requests leave to late-file the section of its Prehearing Brief on the issue of Experimental Low-Income Program And Demand Side Management Programs scheduled to be heard this Friday, September 8, 2006. The Staff had not expended resources drafting this section of its Prehearing Brief in the mistaken belief that this issue was very close to settlement. Unfortunately, as noted, the Staff was mistaken and now asks leave to late file this section of its Prehearing Brief. Undersigned Staff counsel apologizes for any inconvenience not having previously filed this portion of the Staff's Prehearing Brief has caused.

Wherefore Staff requests leave to late-file the Experimental Low-Income Program And Demand Side Management Programs section of its Prehearing Brief.

Respectfully submitted,

/s/ Steven Dottheim

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronic mail to all counsel of record this 6th day of September 2006.

/s/ Steven Dottheim