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May 29, 2003

Missouri Public Service Commission Attn: Secretary of the Commission 200 Madison Street, Suite 100 P.O. Box 360 Jefferson City, Mo. 65102-0360

RE: Case No. HE-2003-0412 MAY 2 9 2003

Missouri Public Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case is an original and the appropriate number of copies of a MOTION FOR FURTHER EXTENSION OF TIME TO FILE 2002 ANNUAL REPORT on behalf of Trigen-Kansas City Energy Corporation.

Copies of this filing have on this date been mailed, hand-delivered, transmitted by facsimile or emailed to counsel of record. Thank you for your attention to this matter.

JAK/er **Enclosures** 

Cc: counsel of record

FILED<sup>3</sup>

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

MAY	2	9	2003
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\_\_Missouri Public

In the matter of the 2002	)	Service Commission
Annual Report of	)	
Trigen-Kansas City Energy	)	Case No. HE-2003-0412
Corporation	)	

## 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 (the "April Motion") 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. In the April Motion, Trigen stated that it is investigating the need for potential adjustments to certain of its records and accounts, and that completion of the investigation has been delayed due to the reorganization of administrative functions and

the recent relocation of accounting personnel and records. At the time of the April Motion, Trigen anticipated being able to file its Annual Report by June 2, 2003.

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 originally anticipated, due in part to the small size of Trigen's staff in comparison to many utilities regulated by the Commission.

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3. Trigen has endeavored in good faith to comply with the Staff recommendation and Commission order extending the filing date, as evidenced by its submission of supplemental pages 1 and 2 of the annual report. However, it has become apparent that Trigen will be unable to meet the June 2, 2003, filing date due to 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; at this time Trigen believes that it will need until July to file its annual report given the need to complete its investigation and make any associated adjustments given its small staff. Rather than allow the June 2 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 July 1, 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 July 1, 2003, to file its annual report.

Respectfully submitted,

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ATTORNEY 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 paid, or by hand-delivery, to the Missouri Public Service Commission's General Counsel's Office and the Office of the Public Counsel on this 29th day of May, 2003.