

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

In the Matter of the Application of Kansas City	)	
Power & Light Company for Approval to Make	)	Case No. ER-2007-0291
Certain Changes in its Charges for Electric	)	
Service to Implement of its Regulatory Plan	)	

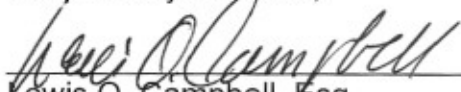
**MOTION OF UNITED STATES DEPARTMENT OF ENERGY, NATIONAL  
NUCLEAR SECURITY ADMINISTRATION FOR APPROVAL OF LATE FILING  
OF POSITION ON ISSUES**

COMES NOW, The United States National Nuclear Security Administration ("NNSA"), the United States Department of Energy ("DOE") and all Federal Executive Agencies ("FEA") (collectively "DOE/NNSA") pursuant to 4 C.S.R. 240-2.075 and moves the Commission to allow it to file its Position on Issues one day late and in support respectfully states:

1. The parties' Position on Issues was required to be filed by September 25, 2007.
2. Because of the press of other matters DOE/NNSA was unable to complete its Position on Issues on the required date.
3. DOE/NNSA has attached as Appendix A its Position on Issues.

**WHEREFORE**, DOE/NNSA requests the Commission to grant its motion to file its Position on Issues late and requests the Commission to treat Attachment A United States Department of Energy and United States National Nuclear Security Administration Position on Issues as its filed position on issues.

Respectfully submitted,



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### Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 26<sup>th</sup> day of September 2007.



Lewis O. Campbell, Esq.

Attorney for DOE, NNSA and FEA