

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

In the Matter of the Application of Kansas)	
City Power and Light Company for)	
Approval to Make Certain Changes in its)	<u>Case No. ER-2006-0314</u>
Charges for Electric Service to Begin the)	
Implementation of its Regulatory Plan.)	

**STAFF'S MOTION FOR EXTENSION OF TIME
TO FILE ISSUES LIST, WITNESS LIST, AND
ORDER OF CROSS-EXAMINATION**

COMES NOW the Staff of the Missouri Public Service Commission, by and through the Commission's General Counsel, and for its Motion for Extension of Time to File Issues List, List of Witnesses and Order of Cross-Examination, states as follows:

1. On March 29, 2006, the Commission by order adopted a procedural schedule herein. That schedule provides in part that the List of Issues, Order of Witnesses and Order of Cross-Examination is due to be filed on Friday, September 29, 2006.

2. Staff hereby advises the Commission that those items are not yet ready for filing. The parties are engaged in developing the issues list and ascertaining the availability dates of witnesses.

3. Staff suggests that an extension of the filing date for the List of Issues, Order of Witnesses and Order of Cross-Examination will not cause any delay in meeting other dates on the Procedural Schedule.

4. Staff has not been able to contact all of the parties herein. However, counsel for Aquila, Empire District Electric Company, Ford Motor Company,

Kansas City Power and Light Company, Missouri Gas Energy, Missouri Industrial Energy Consumers Association, Praxair, Trigen-Kansas City Energy Corp., United States Department of Energy – National Nuclear Security Administration, and Wal-Mart Stores East have indicated that they have no objection.

WHEREFORE, Staff prays that it be granted an Extension of Time, up to and including Friday, October 6, 2006, within which to file the List of Issues, List of Witnesses, and Order of Cross-Examination.

Respectfully submitted,

/s/ Kevin A. Thompson
KEVIN A. THOMPSON
Mo. Bar No. 36288

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102
573-751-6514 (voice)
573-526-6969 (FAX)
kevin.thompson@psc.mo.gov

For the Staff of the Missouri Public
Service Commission

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served on all of the parties of record or their representatives as set out on the attached service list on this 29th day of September, 2006, either by hand delivery, electronic mail, facsimile transmission, or First Class United States Mail, postage prepaid.

/s/ Kevin A. Thompson