BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of the Application of Kansas City Power & Light Company for Approval to Make Certain Changes in its Charges for Electric Service to Continue the Implementation of its Regulatory Plan.))))	<u>File No. ER-2010-0355</u> Tariff No. JE-2010-0692
In the Matter of the Application of KCP&L Greater Missouri Operations Company for Approval to Make Certain Changes in its Charges for Electric Service.)))	<u>File No. ER-2010-0356</u> Tariff No. JE-2010-0693

STAFF'S SUGGESTIONS IN SUPPORT OF MOTIONS FOR EXTENSION OF TIME FOR FILING OF POSTHEARING BRIEFS

COMES NOW the Staff of the Missouri Public Service Commission and in support of the joint motion for extension of time to file posthearing briefs filed on March 3, 2011, in File No. ER-2010-0356 and in support of its separate motion for extension of time to file briefs filed on March 4, 2011, in both File No. ER-2010-0355 and ER-2010-0356 states that the issues for which the briefing extension is requested in the joint motion were heard during the week of February 14-18, 2011; however, currently transcripts of that hearing are only available for February 14th and an in-camera part of February 15th. To require the parties to brief the issues heard during this week without the benefit of the full transcript of that week of hearings would deprive them of a full and fair opportunity to argue their positions to the Commission and, similarly, deprive the Commission of an opportunity to be better informed by the parties. In support of its separate motion Staff notes that in addition to the unavailability of complete transcripts for the week of February 14, 2011, the true-up transcripts are also unavailable, and issues were raised and evidence adduced that bears directly on parties' positions in these cases.

For example new information was adduced regarding cost of debt that directly bears on Staff's positions on that issue in these cases. Staff suggests the Commission would be better served to extend the briefing schedule and allow the parties to more succinctly present their arguments and marshal the evidence in the record to support them.

Wherefore, Staff submits the foregoing suggestions in support of the motions to extend the briefing schedules in these cases.

Respectfully submitted,

/s/ Nathan Williams_

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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 7th day of March 2011.

<u>/s/ Nathan Williams</u>