BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| In the Matter of the Application of KCP&L |) | |
|---|---|-----------------------|
| Greater Missouri Operations Company for |) | Case No. ER-2010-0356 |
| Approval to Make Certain Changes in its |) | |
| Charges for Electric Service |) | |

MOTION FOR EXTENSION OF TIME

COMES NOW the Missouri Retailers Association (MRA) and asks the Commission to extend until November 17, 2010, the time for MRA to file testimony concerning the prudence of the IATAN 1 Air Quality Control System (AQCS) and IATAN 2 plant additions. In support of its motion, MRA states:

- MRA has retained Vantage Energy Consultants, LLC, to provide testimony in these cases concerning the prudency of KCPL's management of the IATAN 1 AQCS and IATAN 2 plant construction projects. Vantage has provided testimony to the Kansas Corporation Commission (KCC) on the subject in proceedings before that Commission.
- 2. In preparing its testimony before the KCC, Vantage acquired information from KCPL that is subject to a protective order of the KCC.
- 3. MRA has not yet been able to secure authorization from the KCC for Vantage to use certain confidential materials in the pending Missouri cases. MRA expects to be able to resolve the issue in time to file testimony on or before November 17, 2010, with this Commission. MRA will file promptly after confidentiality issues are resolved.
- 4. Although MRA expects that there will be some difference between the testimony filed before the KCC and the testimony filed before this Commission, KCPL has had the opportunity in Kansas to review and investigate at length the testimony of Mr. Walter Drabinski, the expert providing Vantage's testimony.

- 5. In this respect, a two-week delay will not unduly burden KCPL, and will provide the Commission with substantial information in the cases which it will not otherwise obtain.
- 6. MRA does not make this motion to unduly delay theses proceedings, and will file the testimony as promptly as possible after the issue has been resolved by the KCC.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By:

Thomas R. Schwarz, Jr., #29645

308 East High Street

Suite 301

Jefferson City, MO 65101

Telephone No.: (573) 634-2500 Facsimile No.: (573) 634-3358

E-mail: tschwarz@blitzbardgett.com

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Motion for Extension of Time was sent by electronic transmission on this 1st day of November, 2010, to the following parties of record:

Angela Cloven

Acloven@empiredistrict.com

Arthur P. Bruder

arthur.burder@hq.doe.gov

Carl J. Lumley

clumley@lawfirmemail.com

Cheryl L. Lobb

lobb@smithlewis.com

David Woodsmall

dwoodsmall@fcplaw.com

Dean Cooper

dcooper@brydonlaw.com

Diana Carter

Dcarter@brydonlaw.com

Diana Vuylsteke

dmvuylsteke@bryancave.com

Douglas Healy

doug@healylawoffices.com

Duncan E. Kincheloe

dkincheloe@mpua.org

Edward F. Downey

efdowney@bryancave.com

James B. Lowery

lowery@smithlewis.com

James C. Swearengen

Lrackers@brydonlaw.com

James M. Fischer

jfischerpc@aol.com

James P. Zakoura

jim@smizak-law.com

Jeremiah D. Finnegan

jfinnegan@fcplaw.com

John Coffman

john@johncoffman.net

Karl Zobrist

kzobrist@sonnenschein.com

Larry W. Dority

lwdority@sprintmail.com

Lewis Mills

opcservice@ded.mo.gov

Lisa A. Gilbreath

lisa.gilbreath@snrdenton.com

Mark W. Comley

comleym@ncrpc.com

Mary Ann Young

maryann.young@dnr.mo.gov

Michael E. Amash

mea@blake-uhlig.com

Michael R. Noack

mike.noack@sug.com

Nathan Williams

Nathan. Williams@psc.mo.gov

Neil S. Sader nsader@sadergarvin.com

Office of General Counsel GenCounsel@psc.mo.gov

Richard Waers jrw@blake-uhlig.com

Robert Wagner rwagner@eruces.com

Roger W. Steiner roger.steiner@kcpl.com

Russell Mitten mitten@brydonlaw.com

Sarah Mangelsdorf <u>sarah.mangelsdorf@ago.mo.gov</u>

Shayla L. McNeill shayla.mcneill@tyndall.af.mil

Steven A. Porter steven.porter@hq.doe.gov

Stuart Conrad stucon@fcplaw.com

Teresa S. Williams Teresa. Williams@cityofls.net

Therese LeBlanc tleblanc@kcp.com

Thomas M. Byrne AmerenUEService@ameren.com

Todd Jacobs todd.jacobs@sug.com

William D. Steinmeier wds@wdspc.com

Thomas W. Schwarz, Jr.