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Missouri Public Service Commission

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January 23, 2001

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DALE HARDY ROBERTS Secretary/Chief Regulatory Law Judge

> DANA K. JOYCE General Counsel

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

RE: Case No. ES-99-581

FILED²

JAN 2 3 2001

Missouri Public Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of STAFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPORT CONCERNING KCP&L'S OPERATIONS.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Lera L. Shemwell

Associate General Counsel

(573) 751-7431

(573) 751-9285 (Fax)

LLS:sw Enclosure

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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STAFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME

TO FILE REPORT CONCERNING KCP&L'S OPERATIONS

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and respectfully requests an extension of 30 days in which to file its report concerning the investigation ordered by the Commission in the July 25, 2000 Report and Order in Case No. EC 99-553. The Commission ordered Staff to investigate and report concerning Kansas City Power & Light Company's (KCPL) safety training and procedures and whether there has been a decline in KCPL's performance over the past ten years.

Staff's report concerning the Hawthorn 5 explosion will be filed on January 25, 2001.

Staff is requesting this extension only for the report concerning KCPL's procedures,

maintenance and performance over the past ten (10) years. Staff will file that report no later than

February 26, 2001.

Neither the Office of the Public Counsel nor KCPL object to this request for extension of time.

WHEREFORE the Staff respectfully moves the Commission grant an additional 30 days time for filing this report.



Respectfully submitted,

DANA K. JOYCE General Counsel,

Lera L. Shenwell

Assistant General Counsel Missouri Bar No. 43792

Attorneys for the Staff of the Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102 (573) 751-7431 (Telephone) (573) 751-9285 (Fax)

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 23rd day of January 2001.

Service List For Case No. ES-99-581 Revised: January 23, 2001

Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102

William G. Riggins Kansas City Power & Light Company 1201 Walnut Kansas City, MO 64106-2124 James M. Fischer Fischer & Dority, P.C. 101 Madison Street, Suite 400 Jefferson City, MO 65101