

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

In the Matter of the Consideration of Adoption)	
of the PURPA Section 111(d)(16) Consideration)	
of Smart Grid Investments Standard as Required)	Case No. EW-2009-0290
by Section 1307 of the Energy Independence and)	
Security Act of 2007.)	

In the Matter of the Consideration of Adoption)	
of the PURPA Section 111(d)(16) Integrated)	
Resource Planning Standard as Required by)	Case No. EW-2009-0291
Section 532 of the Energy Independence and)	
Security Act of 2007.)	

In the Matter of the Consideration of Adoption)	
of the PURPA Section 111(d)(17) Rate Design)	
Modifications to Promote Energy Efficiency)	Case No. EW-2009-0292
Investments Standard as Required by Section)	
532 of the Energy Independence and Security)	
Act of 2007.)	

In the Matter of the Consideration of Adoption)	
of the PURPA Section 111(d)(17) Smart Grid)	
Information Standard as Required by Section)	Case No. EW-2009-0293
1307 of the Energy Independence and Security)	
Act of 2007.)	

**STAFF’S RESPONSE TO ORDER SETTING DATE FOR FILING PROCEDURAL
SCHEDULES AND REQUEST FOR LEAVE TO LATE-FILE**

Comes now the Staff of the Missouri Public Service Commission (Staff) through the Office of the General Counsel of the Missouri Public Service Commission (Commission) in response to the December 17, 2008 Order of the Commission directing the parties to jointly prepare and file proposed procedural schedules no later than February 9, 2009. In addition, the Staff requests leave to late-file this response. The Staff states as follows regarding these matters:

1. On February 2, 2009, the Commission convened a prehearing conference beginning at 10:00 a.m. The parties in attendance in person in Room 310 in the Governor Office Building

and in attendance by speakerphone discussed the necessity of procedural schedules and procedural schedules for Commission consideration of the four Public Utility Regulatory Policies Act (PURPA) electric standards in the Energy Independence and Security Act of 2007.

2. The parties in attendance had differing perspectives and agreed that the most efficient and economical approach would be for the Staff to file a proposal(s) with the Commission addressing all four PURPA electric standards and that the other parties would file responses to the Staff's proposal(s). Given the immediate schedules of testimony/report filings and other matters involving the various parties, such as in the Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company rate cases, it was agreed that the Staff would file on February 19, 2009 its approach and procedural proposal(s) for the Commission addressing the four PURPA electric standards and the other parties would file their responses on March 3, 2009. Hopefully, the parties will be close enough in their approaches and procedural proposals that an agreement will be able to be reached by the parties regarding approach and procedural schedules soon after the March 3, 2009 filings. Otherwise, the matter of approach and procedural schedule(s) will have to be decided by the Commission.

3. Undersigned counsel for the Staff requests leave to late-file the Staff's response, two days out-of-time. Undersigned counsel apologizes for the inconvenience to the Commissioners, Regulatory Law Judge, and parties, but was unable to timely draft and distribute this document, contact the parties, and file this response due to the demands of other Commission cases and other Commission business.

Wherefore the Staff on behalf of the various parties that were granted intervention in the original "EO" designated PURPA cases, now designated as "EW" workshop cases, submits the short-term proposal discussed above for immediately addressing the matter of the Commission's

consideration of the four PURPA electric standards in the Energy Independence and Security Act of 2007, which standards are identified in the captions of the instant cases, EW-2009-0290, EW-2009-0291, EW-2009-0292, and EW-2009-0293. The Staff also requests leave to late-file this pleading.

Respectfully submitted,

/s/ Steven Dottheim

Steven Dottheim
Chief Deputy General Counsel
Missouri Bar No. 29149

Nathan Williams
Deputy General Counsel
Missouri Bar No. 35512

Attorneys for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7489 (Telephone) (Dottheim)
(573) 751-8702 (Telephone) (Williams)
(573) 751-9285 (Fax)
e-mail: steve.dottheim@psc.mo.gov
e-mail: nathan.williams@psc.mo.gov

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 11th day of February 2009.

/s/ Steven Dottheim