

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

In the Matter of a Working Case to Draft a Rule to)
Revise Commission Rule 4 CSR 240-3.105) **File No. EW-2014-0239**

**STAFF MOTION TO EXTEND DATE FOR FILING STAFF RECOMMENDATION
REGARDING COMMISSION RULE 4 CSR 240-3.105¹**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through undersigned counsel of the Staff Counsel's Office, and files Staff's request for an Order extending the date by which the Staff is to prepare and present a revised Commission Rule 4 CSR 240-3.105 to the Commission from December 19, 2014 to February 20, 2015. In response thereto, the Staff states as follows:

1. There have been two workshops to date regarding Commission Rule 4 CSR 240-3.105: the first on September 11, 2014 and the second last week on November 25, 2014. The Staff presented at the first workshop a draft revision of 4 CSR 240-3.105 and presented at the second workshop a further revision reflecting comments made at the first workshop.

2 The Staff believes that both workshops have been productive and that based on the discussions that occurred at the second workshop last week, a third workshop would be beneficial to the Staff in its work preparing a revised rule for presentation to the Commission.

3 An extension of time for a third workshop would permit the Staff the opportunity to submit to the stakeholders another iteration of a revised 4 CSR 240-3.105 for stakeholders to comment on.

¹ 4 CSR 240-3.105 involves filing requirements for electric utility applications for certificates of convenience and necessity ("CCN") for electric service territory or to construct electric generating plant or electric and gas transmission lines to facilitate the operation of electric generating plant.

4. The Staff appreciates the desire of the Commission and stakeholders to keep the matter of the review of 4 CSR 240-3.105 moving on a timely basis, but believes the additional time for a third workshop would be time well spent. Dogwood Energy, Inc., Union Electric Company d/b/a Ameren Missouri, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, The Empire District Electric Company, Missouri Energy Development Association, and Missouri Industrial Energy Consumers have indicated to undersigned counsel that the Staff may indicate that they do not object to this proposed limited extension of time for a third workshop.

WHEREFORE the Staff requests an Order of the Commission extending the date by which the Staff is to prepare and present a revised rule to the Commission from December 19, 2014 to February 20, 2015.

Respectfully submitted,

/s/ Steven Dottheim

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing *Staff Motion To Extend Date For Filing Staff Recommendation Regarding Commission Rule 4 CSR 240-3.105* have been transmitted electronically to all Commission-certificated electric utilities in the State of Missouri, and to all parties in the most recent triennial 4 CSR 240-Chapter 22 filing for each electric utility this 5th day of December, 2014. For Union Electric Company, d/b/a Ameren Missouri that is File Nos. EO-2011-0271/EO-2015-0084, for The Empire District Electric Company that is File No. EO-2013-0547, for Kansas City Power & Light Company that is File No. EO-2012-0323, and for KCP&L Greater Missouri Operations Company that is File No. EO-2012-0324. See *Attachment A*.

/s/ Steven Dottheim

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