

BEFORE THE STATE CORPORATION COMMISSION STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

NOV 29 2001

In the Matter of the Investigation by the)
Commission of the Adequacy of Quality of)
Retail Service Provided by Kansas Electric)
Public Utilities and the Prudence of Developing)
Electric Service Quality Standards)

Jeffery S. Wagoner Docket
Room

Docket No. 02-GIME-365-GIE

JOINT MOTION FOR EXTENSION OF TIME

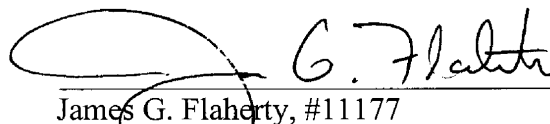
COME NOW Western Resources, Inc. (WRI), Kansas Gas and Electric Company (KGE), UtiliCorp United Inc., d/b/a WestPlains Energy (WestPlains), Kansas City Power & Light Company (KCPL), and The Empire District Electric Company (Empire) (collectively referred to as the "Kansas Electric Public Utilities"), and jointly move for an extension of time to respond to Staff's initial position on the issues relative to service quality which are identified in the Kansas Corporation Commission's (Commission) Order issued in this matter on November 16, 2001. In support of their joint motion, the Kansas Electric Public Utilities state as follows:

1. On November 16, 2001 the Commission issued an Order opening this docket.
2. The Commission's Order instructed the Staff to file its initial position on the issues relative to service quality, and a proposed procedure, by December 1, 2001.
3. The Commission also instructed interested utilities to file their initial position on the issues addressed by Staff, and their proposals for a procedural schedule, within 15 days following the filing of the response by Staff.
4. On November 26, 2001 counsel for WestPlains and Empire contacted the Staff's counsel in this matter to inquire whether Staff had any objection to extending the filing date for all

of the utilities in this matter to January 16, 2002. Counsel for WestPlains and Empire explained that he had talked to WRI, KGE and KCPL, and that all had expressed an interest in obtaining an extension because of the difficulty in completing their responses due to the upcoming holiday season and end of the year vacations. Staff's counsel indicated to WestPlains and Empire's counsel that Staff had no objection to the January 16, 2002 extension and suggested that the electric utilities file a motion for an extension of time.

5. The Kansas Electric Public Utilities request that the Commission issue an order granting their motion and extending their filing date for their initial positions on the issues addressed by Staff and their proposals for a procedural schedule to January 16, 2002. This request for an extension of time should not prejudice the Commission's investigation in this matter.

WHEREFORE, for the reasons set forth herein the Kansas Electric Public Utilities jointly move for an extension of time to respond to Staff's initial position on the issues relative to service quality and proposed procedure by January 16, 2002.



James G. Flaherty, #11177
ANDERSON, BYRD, RICHESON, FLAHERTY & HENRICHS
216 S. Hickory, P. O. Box 17
Ottawa, Kansas 66067
(785) 242-1234
Attorneys for The Empire District Electric Company
and UtiliCorp United Inc., d/b/a WestPlains Energy



Martin J. Bregman
WESTERN RESOURCES, INC.

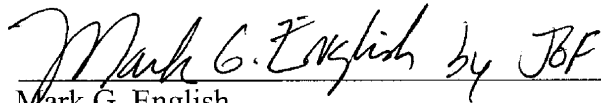
818 Kansas Avenue

P. O. Box 889

Topeka, Kansas 66601

(785) 575-1986

Attorneys for Western Resources, Inc. and Kansas Gas
and Electric Company



Mark G. English

KANSAS CITY POWER & LIGHT

1201 Walnut

Kansas City, Missouri 64106-2124

(816) 556-2608

Glenda L. Cafer

CAFER LAW OFFICES, LLC

2401 SW Crest Drive

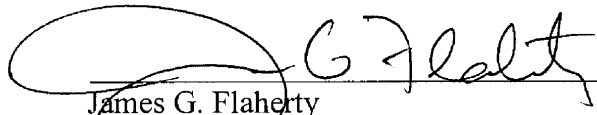
Topeka, Kansas 66614

Attorneys for Kansas City Power & Light

VERIFICATION

STATE OF KANSAS, FRANKLIN COUNTY, ss:


James G. Flaherty, of lawful age, being first duly sworn on oath, states: That he is authorized to make this Verification; that he has read the above and foregoing Joint Motion for Extension of Time; that he knows the contents thereof; and the statements contained herein are true and correct.



James G. Flaherty

SUBSCRIBED AND SWORN to before me this 28th day of November, 2001.



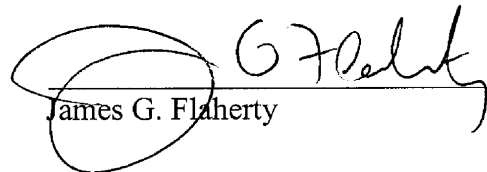


Notary Public

My Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was mailed, postage prepaid, this 28th day of November, 2001, addressed to: Mr. Tom Stratton, Assistant General Counsel, Kansas Corporation Commission, 1500 S. W. Arrowhead Road, Topeka, Kansas 66604.



James G. Flaherty