

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

In the Matter of Kansas City Power & Light )  
Company's Request for Authority to )  
Implement a General Rate Increase for )  
Electric Service )

**File No. ER-2016-0285**

**MOTION FOR EXTENSION OF TIME**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion for an Extension of Time*, states as follows:

1. On May 3, 2017, the Commission issued its Report and Order in this action. The Report and Order embodied the findings and conclusions the Commission found for each issue, and Kansas City Power and Light Company ("KCPL") was ordered to file compliance tariff sheets implementing the Commission's decisions no later than May 9, 2017. The Commission's Report and Order also ordered Staff to file a recommendation regarding approval of the compliance tariff sheets no later than May 15, 2017. Any other party wishing to respond to the compliance tariff sheets must also do so no later than May 15, 2017.

2. On May 9, 2017, KCPL filed compliance tariffs, with the exception of tariff sheet 49P regarding the Net Margin Revenue Rates for the Demand Side Investment Mechanism Rider (Cycle 2). At the time of this pleading, KCPL has still not filed this tariff sheet. KCPL has represented that they are working industriously to correct an error that is preventing KCPL from filing this tariff sheet, and assured Staff that KCPL will file tariff sheet 49P tomorrow, May 16, 2017.

3. Staff states that it has diligently undertaken to review the more than 100 sheets and that, as of now, it has found numerous instances in which the proposed sheets do not accurately reflect the Commission's order. Staff has advised the

Company of each such instance and, as a result of communications between the Staff and KCPL, KCPL filed numerous substitute tariff sheets today, May 15, 2017.

4. Nonetheless, in order to provide the Commission with a thorough review of all substitute tariff sheets filed to ensure compliance with the Report and Order, and due to the need to assiduously review the not yet filed tariff sheet 49P, Staff requests an additional 24 hours to file its recommendation.

5. If Staff is required to file its recommendation prior to the correction of the previously mentioned issues and its subsequent review, its recommendation will necessarily be that the Commission should reject the compliance tariffs. Furthermore, if Staff does not receive tariff sheet 49P in a timely manner for review in the additional 24-hour extension, Staff will recommend the Commission reject the tariffs for not complying with the Report and Order.

6. The Staff would also suggest that the effective date of May 28, 2016 can still be met, even with this additional time, as Section 393.140(11) RSMo. 2000 allows the Commission to approve changes without 30 days' notice, for good cause, and would note that the Commission can delegate its authority to expedite the approval process, if the Commission would find this to be in the best interest of all the stakeholders.

**WHEREFORE**, Staff prays that the Commission will grant an extension of 24 hours additional time, up to and including Tuesday, May 16, at 5:00 p.m., for the filing of its recommendation regarding the Company's Compliance Tariffs. Additionally, Staff prays that the Commission grant any other party wishing to respond to KCPL's compliance tariffs the same additional time.

Respectfully submitted,

**/s/ Nicole Mers**

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Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 15<sup>th</sup> day of May 2017, to all counsel of record.

**/s/ Nicole Mers**