

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

In the Matter of Vicinity Energy Kansas) **File No. HT-2021-0245**
City, Inc.'s Adjustment to Its PACC Tariff)

MOTION FOR EXPEDITED TREATMENT

COMES NOW Vicinity Energy Kansas City, Inc. (“Vicinity”) and for its Motion for Expedited Treatment states as follows:

1. On February 1, 2021, Vicinity filed revised tariff sheets along with supporting testimony and workpapers to implement an annual change in Vicinity’s Production Adjustment Cost Clause. Those tariffs bear an effective date of April 1. After the February 1 PACC filing, Vicinity has experienced a period of extraordinarily high gas costs, which will have a dramatic impact on future PACC adjustments. In order to proactively address these gas price spikes, Vicinity initiated discussions with Staff about possible modifications to the currently pending PACC filing.

2. Those discussions resulted in a Stipulation and Agreement (“Stipulation”), filed concurrently with this Motion. In the Stipulation, Vicinity and the Staff of the Commission request that the Commission reject the PACC tariff sheets filed on February 1, and instead order the filing of new PACC tariff sheets in compliance with the Commission’s order approving the Stipulation. Because the tariff sheets bear an effective date of April 1, Vicinity seeks expedited treatment of the Stipulation.

3. Pursuant to 20 CSR 4240-2.080(14), Vicinity requests that the Commission expeditiously approve the Stipulation and Agreement and order the filing of compliance tariffs so that the compliance tariffs may take effect on April 1, 2021. In order to allow the compliance tariffs to be filed ten days before the April 1 effective date, Vicinity requests that the Commission issue its order approving the Stipulation no later than March 21. By doing so, the

Commission will avoid the harm that would be caused by allowing the currently pending PACC tariff sheets, which do not take into account the effects of the recent gas price spikes, to go into effect. There will be no negative effects from the granting of this Motion. This Motion was filed as soon as it could have been under the circumstances.

WHEREFORE, for the foregoing reasons and in compliance with 20 CSR 4240-2.080(14), Vicinity respectfully requests that the Commission grant this Motion for Expedited Treatment, and approve the concurrently filed Stipulation and Agreement expeditiously so that compliance tariffs may be effective April 1, 2021, and for such other and further relief as the Commission deems appropriate under the circumstances.

Respectfully submitted,

BY: /s/ Lewis Mills
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**ATTORNEY FOR VICINITY ENERGY
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CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record of this case on this 12th day of March, 2021.

/s/ Lewis Mills