

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

In the Matter of the KCP&L Greater Missouri)
Operations Company’s Application)
For Authorization to Suspend Payment) File No. ET-2014-0277
Of Certain Solar Rebates)

**KCP&L GREATER MISSOURI OPERATIONS COMPANY’S RESPONSE
TO RENEW MISSOURI’S APPLICATION FOR REHEARING**

COMES NOW KCP&L Greater Missouri Operations Company (“GMO” or “Company”), pursuant to 4 CSR 240-2.080, and files its response to Earth Island Institute d/b/a Renew Missouri’s (“Renew Missouri”) Application for Rehearing filed on June 9, 2014, in the above-referenced file.

A. Renew Missouri’s Application for Rehearing is Not Timely Under Missouri Law.

1. Applications for rehearing are governed under 386.500.2 RSMo. which provides that an application for rehearing must be made before the effective date of the Missouri Public Service Commission’s (“Commission”) order or decision. The Commission’s *Order Approving Tariff* was issued on May 28, 2014 and became effective on June 8, 2014. On June 9, 2014 at 5:00 p.m., Renew Missouri filed its Application for Rehearing. Under 386.500.2 RSMo., 4 CSR 240-2.160 and 4 CSR 240-2.050(1), the application was untimely.

2. Because Section 386.500 sets a jurisdictional deadline for applications for rehearing, the Commission must reject Renew Missouri’s Application because it did not comply with the deadline.

B. Renew Missouri’s Application for Rehearing Violates the Stipulation and Agreement in File No. ET-2014-0059.

3. On May 22, 2014, Renew Missouri filed Comments in which it candidly stated: “Pursuant to a Non-Unanimous Stipulation and Agreement filed in File No. ET-2014-0059,

Renew Missouri and the other Signatories have agreed ‘that they will not object to an application that is designed to cease payments **beyond the specified level.**’” (*emphasis added*) Despite this statement, Renew Missouri’s Application for Rehearing is an objection to GMO’s ceasing payments beyond the specified level. The Commission should disregard Renew Missouri’s Application as it is a violation of the Stipulation and Agreement in File No. ET-2014-0059.

WHEREFORE, KCP&L Greater Missouri Operations Company respectfully files its response to the Application for Rehearing filed by Renew Missouri on June 9, 2014.

Respectfully submitted,

/s/ Roger W. Steiner

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**ATTORNEYS FOR KCP&L GREATER
MISSOURI OPERATIONS COMPANY**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, to the certified service list in File No. ET-2014-0277, this 11th day of June, 2014.

/s/ Roger W. Steiner

Roger W. Steiner