

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

In the Matter of Veolia Energy)
Kansas City, Inc.'s) **Case No. HR-2018-0341**
Request to Initiate a Small)
Utility Rate Case)

NOTICE OF EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through counsel, on behalf of itself, Veolia Energy Kansas City, Inc. (Veolia), and the Office of the Public Counsel (OPC), and for its *Notice of Extension* in this matter hereby states:

1. Veolia Energy Kansas City, Inc. filed its *Request to Initiate a Small Utility Rate Case* on May 10, 2018. The parties extended the Day 150 deadline by 14 days previously, which resulted in a due date of October 23, 2018. The parties are presently meeting to finalize the proposed example tariffs to reflect the agreements reached.

2. Under Commission rule 4 CSR 240-3.050(12) Staff and a company party can agree to extend the dates applicable to a small utility rate case for up to 60 days from those mandates set out in Commission rule 4 CSR 240-3.030 regarding the small utility rate case procedure.

3. Staff, Veolia and OPC have come to the mutual agreement that an extension is proper. Therefore, Staff hereby notifies the Commission of an additional 14 day extension of the small rate case timeline, beginning with Day 150, requiring the parties to file an executed disposition agreement or a

request for an evidentiary hearing. Staff has attached an updated Small Rate Case timeline to this pleading as Attachment A to reflect the updated dates which would result from this extension.

WHEREFORE, Staff prays that the Commission will take notice of this *Notice of Extension*; accept the updated Small Rate Case Timeline extending the filing date for a disposition agreement or request for evidentiary hearing by 14 days; and grant such other and further relief as the Commission considers just in the circumstances.

/s/ Whitney Payne

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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 23rd day of October, 2018, to all counsel of record.

/s/ Whitney Payne

Small Utility Rate Case Timeline

MO PSC Case No. HR-2018-0341

Utility Name & Contact Info	Veolia Energy Kansas City, Inc.
Contact Person	David Jordan
Mailing Address	700 East Butterfield Road, Suite 201 Lombard, IL 60148
Phone Contact	630-218-1500
Phone Contact	
E-Mail Address	
Date Case Opened	May 10, 2018
Agreement Filing Due Date	November 6, 2018
9-Month Deadline	February 10, 2019
11-Month Deadline	April 10, 2019

Set out on the following pages is the activities timeline pertaining to the processing of the above-referenced small utility revenue increase request. This timeline assumes that the Staff's investigation of the revenue increase request will result in a conclusion that an increase in the subject utility's operating revenues is needed, that at least the Utility and Staff will reach an agreement regarding the overall resolution of the request without the need for time extensions, and that the request will be resolved without an arbitration process being used or an evidentiary hearing being held. For cases where an arbitration process is going to be used or an evidentiary hearing is going to be held, it is anticipated that a procedural schedule will be set when that becomes known. In such instances, the 9-month and 11-month deadlines will need to be considered in setting the procedural schedule.

The schedule set out in the timeline establishes the Target Due Date for the completion of certain activities needed to process the request in a timely manner. Extensions of the disposition agreement filing deadline, which is 150 days after the date the utility files its request, and certain other deadlines are allowed (and under some circumstances are required) and if executed will result in changes to the timeline. Agreements for such extensions, which are limited to a maximum of 60 days, will be reduced to writing and filed in the case file, along with an updated timeline.

The entries in the Target Day column represent the number of days from the date the utility filed its request. The entries in the Target Due Date column show the date when the Target Day hits the calendar. To determine the entries for the Calendar Due Date column, Target Due Dates falling on a weekend or a holiday are moved to the next regular working day, except that the effective dates for pending revised tariff sheets cannot be adjusted.

Target Day	Target Due Date	Calendar Due Date	Case Activity	Responsible "Party"	Rule Section
0	05/10/18	N/A	Request Letter Filed and Case Opened (agreement filing due date calculated from this date)	Utility	3
5	05/15/18	05/15/18	Compliance with Section 4 of Rule Confirmed (case can be dismissed in case of non-compliance)	Case Manager	4
14	05/24/18	05/24/18	Case Activities Timeline Filed in Case File	Case Manager	5
19	05/29/18	05/29/18	Draft of Initial Customer Notice Sent to Utility & OPC	Case Manager	
20	05/30/18	05/30/18	Requests for Information Needed for Audit Communicated to Utility by Assigned Staff (if done in writing, copies also sent to OPC)	Assigned Staff	
30	06/09/18	06/11/18	Initial Customer Notice Mailed to Customers (copy sent to Case Manager for filing in case file)	Utility	7
40	06/19/18	06/19/18	Responses to Requests for Information Provided to Staff by Utility (staff provides copies of information received to OPC) OR Extension of Agreement Filing Due Date Agreed to by Utility OR Staff May File Motion to Dismiss Case	Utility & Assigned Staff	4
			Copy of Initial Customer Notice Filed in Case File	Case Manager	7
50	06/29/18	06/29/18	Follow-Up Requests for Information Communicated to Utility by Assigned Staff (if done in writing, copies also sent to OPC)	Assigned Staff	
60	07/09/18	07/09/18	End of Response Period for Initial Customer Notice	N/A	7
70	07/19/18	07/19/18	Responses to Follow-Up Requests for Information Provided to Staff by Utility (staff provides copies of information received to the OPC) OR Extension of Agreement Filing Due Date Agreed to by Utility OR Staff May File Motion to Dismiss Case	Utility & Assigned Staff; Case Manager	4
75	07/24/18	07/24/18	Deadline for Completion of Construction Projects to be Included in Case OR Agreement Filing Due Date Extended So Projects Can be Included in Case	Utility; Case Manager	
			Continued Compliance with Section 4 of Rule Confirmed (case can be dismissed in case of non-compliance)	Case Manager	4
			Unless Notified Otherwise, or Unless Extensions Have Been Agreed Upon, Utility & OPC Can Assume the Process is On-Track for Timely Completion	Case Manager	

Target Day	Target Due Date	Calendar Due Date	Case Activity	Responsible "Party"	Rule Section
80	07/29/18	07/30/18	Basic Audit/Investigation Work Completed	Assigned Staff	
85	08/03/18	08/03/18	Initial Audit/Investigation Reports Completed and Provided to Case Manager	Assigned Staff	
90	08/08/18	08/08/18	Overview of Staff's Initial Audit/Investigation Results Provided to the Utility & OPC	Case Manager	9
100	08/18/18	08/20/18	Utility & OPC Submit Responses Regarding Staff's Case Overview to Case Manager (errors/omissions to be identified and suggested changes to be included) OR Staff Assumes Information Provided is Acceptable (Staff's audit considered "complete" at this time)	Utility & OPC	
115	09/02/18	09/04/18	Any necessary updates to Audit/Investigation Reports finalized and provided to Case Manager	Assigned Staff	
120	09/07/18	09/07/18	Staff's Settlement Proposal Packet Sent to Utility & OPC and Arrangements Made for Conference Call or Meeting to Discuss the Proposal	Case Manager	10
130	09/17/18	09/17/18	Conference Call or Meeting Held with Utility & OPC to Discuss Staff's Settlement Proposal	Utility, OPC & Staff	
135	09/22/18	09/24/18	Utility & OPC Notify Staff of Whether They Agree with the Settlement Proposal (if not, the reasons for that and suggested changes to the settlement proposal documents are provided to the Case Manager)	Utility & OPC	4
			Utility Must Respond OR Agree to Extension of Agreement Filing Due Date OR Staff May File Motion to Dismiss Case	Utility; Case Manager	
140	09/27/18	09/27/18	Agreed-Upon Changes to Settlement Proposal Documents Completed and Final Disposition Agreement Sent to Company for Signing (copy also sent to OPC; OPC may or may not sign)	Case Manager	4
			Continued Compliance with Section 4 of Rule Confirmed (case can be dismissed in case of non-compliance)	Case Manager	
145	10/02/18	10/02/18	Signed Disposition Agreement Returned to Staff	Utility; OPC (if applicable)	
			Staff Sends Revised Tariff Sheets and Draft Tariff Filing Transmittal Letter to the Utility	Case Manager	
150	11/06/18	11/06/18	Staff Files Executed Disposition Agreement	Case Manager	11

Activities needed from this point forward vary based on the approach taken by the OPC. The next three sections set out the activities needed based on the different OPC approaches that are possible.

This section pertains to the situation where the Utility, Staff & OPC reach an agreement on the overall disposition of the request, and is thus based on the fact that the Utility will not send out a second customer notice. In this situation, a minimum of 30 days is needed between the filing date and the proposed effective date of the Utility's tariff revisions. The dates shown assume that the Utility will make a 30-day tariff filing on Day 155.

Target Day	Target Due Date	Calendar Due Date	Case Activity	Responsible "Party"	Rule Section
155	11/11/18	11/13/18	Utility Files Necessary Tariff Revisions	Utility	13
165	11/21/18	11/21/18	Staff Recommendation Filed if applicable OR ordered by the Commission. (includes confirmation of Utility's continued compliance with Section 4 of Rule OR motion for suspension of tariff revisions requesting correction of the deficiencies will be submitted)	Case Manager	
175	12/01/18	12/03/18	Order Approving Tariff Revisions Issued	Assigned RLJ	
185	12/11/18	12/11/18	Tariff Revisions Effective "On and After" this Date	N/A	13
190	12/16/18	12/17/18	Draft of Final Customer Notice Sent to Utility & OPC	Case Manager	
200	12/26/18	12/16/18	Final Customer Notice Mailed to Customers (copy sent to Case Manager for filing in case file)	Utility	22
210	01/05/19	01/07/19	Copy of Final Customer Notice Filed in Case File	Case Manager	22
215	01/10/19	01/10/19	Notice Closing Case Issued	Assigned RLJ	

This section pertains to the situation where only the Utility and Staff reach an agreement on the overall disposition of the request, and is thus based on the fact that the Utility will send out a second customer notice. This section is also based on the assumption that the OPC will not request a local public hearing. In this situation, a minimum of 45 days is needed between the filing date and the proposed effective date of the Utility's tariff revisions. The dates shown assume that the Utility will make a 45-day tariff filing on Day 155.

Target Day	Target Due Date	Calendar Due Date	Case Activity	Responsible "Party"	Rule Section
150	11/11/18	11/13/18	Draft of Second Customer Notice Sent to Utility & OPC	Case Manager	
155	11/16/18	11/16/18	Utility Files Necessary Tariff Revisions	Utility	14
160	11/21/18	11/21/18	Second Customer Notice Mailed to Customers (copy sent to Case Manager for filing in case file)	Utility	14
170	12/01/18	12/02/18	Copy of Second Customer Notice Filed in Case File	Case Manager	14
180	12/11/18	12/11/18	End of Response Period for Second Customer Notice	N/A	14
187	12/18/18	12/18/18	OPC Files Its Position Statement	OPC	15
188	12/19/18	12/19/18	Staff Recommendation Filed if applicable OR ordered by the Commission. (includes confirmation of Utility's continued compliance with Section 4 of Rule OR motion for suspension of tariff revisions requesting correction of the deficiencies will be submitted)	Case Manager	
190	12/21/18	12/21/18	Order Approving Tariff Revisions Issued	Assigned RLJ	
200	12/31/18	12/31/18	Tariff Revisions Effective "On and After" this Date	N/A	14
205	01/05/19	01/07/19	Draft of Final Customer Notice Sent to Utility & OPC	Case Manager	
215	01/15/19	01/15/19	Final Customer Notice Mailed to Customers (copy sent to Case Manager for filing in case file)	Utility	22
225	01/25/19	01/25/19	Copy of Final Customer Notice Filed in Case File	Case Manager	22
230	01/30/19	01/30/19	Notice Closing Case Issued	Assigned RLJ	

This section pertains to the situation where only the Utility and Staff reach an agreement on the overall disposition of the request, and is thus based on the fact that the Utility will send out a second customer notice. This section is also based on the assumption that the OPC will request a local public hearing and that one will be held. In this situation, a minimum of 45 days is needed between the filing date and the proposed effective date of the Utility's tariff revisions. The dates shown assume that the Utility will make a 45-day tariff filing on Day 155. The dates also assume that the tariff revisions will be suspended for 45 days past the proposed effective date, and that the local public hearing will be held 30 days before the end of the suspension period.

Target Day	Target Due Date	Calendar Due Date	Case Activity	Responsible "Party"	Rule Section
150	11/06/18	11/06/18	Draft of Second Customer Notice Sent to Utility & OPC	Case Manager	
155	11/11/18	11/11/18	Utility Files Necessary Tariff Revisions	Utility	14
160	11/21/18	11/21/18	Second Customer Notice Mailed to Customers (copy sent to Case Manager for filing in case file)	Utility	14
170	12/01/18	12/02/18	Copy of Second Customer Notice Filed in Case File	Case Manager	14
180	12/11/18	12/11/18	End of Response Period for Second Customer Notice	N/A	
187	12/18/18	12/18/18	OPC Files Request for Local Public Hearing	OPC	15
190	12/21/18	12/21/18	Order Setting Local Public Hearing and Suspending Tariff Revisions Issued	Assigned RLJ	
195	12/26/18	12/26/18	Draft of LPH Customer Notice Sent to Utility & OPC	Case Manager	
200	12/31/18	12/31/18	Notice of Local Public Hearing Mailed to Customers (copy sent to Case Manager for filing in case file)	Utility	18
210	01/05/19	01/07/19	Copy of LPH Customer Notice Filed in Case File	Case Manager	18
215	01/15/19	01/15/19	Local Public Hearing Held	Assigned RLJ	
222	01/22/19	01/22/19	Staff Files Notice re: Possible Changes to the Disposition Agreement Based on Info Provided at the Local Public Hearing (includes motion to suspend tariff revisions if needed) 5 WORKING DAYS	Case Manager	19
229	01/29/19	01/29/19	OPC Files Its Position Statement** 10 WORKING DAYS	OPC	19
230	01/30/19	01/30/19	Staff Recommendation Filed if applicable OR ordered by the Commission. (includes confirmation of Utility's continued compliance with Section 4 of Rule OR motion for suspension of tariff revisions requesting correction of the deficiencies will be submitted)	Case Manager	
235	02/04/19	02/04/19	Order Approving Tariff Revisions Issued	Assigned RLJ	
245	02/14/19	02/14/19	Tariff Revisions Effective "On and After" this Date	N/A	14
250	02/19/19	02/19/19	Draft of Final Customer Notice Sent to Utility & OPC	Case Manager	
260	03/01/19	03/01/19	Final Customer Notice Mailed to Customers (copy sent to Case Manager for filing in case file)	Utility	22
270	03/11/19	03/11/19	Copy of Final Customer Notice Filed in Case File	Case Manager	22
275	03/16/19	03/16/19	Notice Closing Case Issued	Assigned RLJ	