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

In the Matter of the 2013 Annual Update of	)	
KCP&L Greater Missouri Operations Company	)	Case No. EE-2013-0389
Pursuant to 4 CSR 240-22	)	

## KCP&L GREATER MISSOURI OPERATIONS COMPANY'S RESPONSE TO ORDER DIRECTING FILING

Comes now KCP&L Greater Missouri Operations Company ("GMO" or the "Company"), and pursuant to the Commission's March 7, 2013 *Corrected Order Directing Filing* ("Order"), respectfully states as follows:

- 1. In its *Order*, the Commission ordered that GMO (and other parties) should state how they would like to proceed in this matter. (*Order*, p. 2)
- 2. In response to the Commission's *Order*, GMO would renew its request that the Commission extend the date for filing its 2013 Annual Update Report and its 2013 Annual Update Workshop by three months.
- 3. GMO believes this approach is appropriate and reasonable under the circumstances of this case. It is also consistent with the *Joint Filing* made by the GMO and other parties, including Dogwood Energy, LLC ("Dogwood") on November 19, 2012 in Case No. EO-2012-0324 which stated in part:

However, the Signatories have agreed that GMO will file, pursuant to Commission Rule 4 CSR 240- 22.080(13) and (15), for a variance to extend the 2013 Annual Update Report and the 2013 Annual Update Workshop by three (3) months, such that GMO will submit the 2013 Annual Update report no less than twenty (20) days prior to the 2013 Annual Update Workshop, which will be requested to be extended to on or about July 1, 2013. The Signatories note that the timing of many of the resolutions that have been reached is based upon GMO being granted an extension for its 2013 Annual Update Workshop to on or about July 1, 2013. (Joint Filing, p. 2)

Dogwood's recently proposed condition in this proceeding that GMO would not enter into commitments contrary to the results of the studies that GMO has agreed to perform in connection

As stated in GMO's Response to Order Directing Filing filed on March 1, 2013,

with the 2013 Annual Update Report is acceptable to GMO, but only if it applies to the resources

sought in the January, 2013 RFP and that this condition will expire with the filing of the 2013

Annual Update to be filed in June, 2013. GMO needs to be in a position to manage its business

and move forward with its planned activities following the filing of the 2013 Annual Update in

June 2013. GMO will continue to work with the stakeholders in this proceeding, and will

respond to comments made on the update filing at the appropriate time.

5. In a companion case related to the 2013 Annual Update of Kansas City Power &

Light Company ("KCP&L"), the Commission on March 13, 2013, issued its Order Granting

Application For Variance which granted KCP&L the same relief that GMO is requesting in this

proceeding. See Order Granting Application For Variance, File No. EE-2013-0388 (issued

March 13, 2013).

4.

WHEREFORE, GMO requests that the Commission issue an order granting its

requested variances.

Respectfully submitted,

|s| Roger W. Steiner

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Attorney 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 handdelivered, emailed or mailed, postage prepaid, to all counsel of record in this case this 14<sup>th</sup> day of March, 2013.

|s| Roger W. Steiner

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