

In the Matter of the 2012 Resource Plan of)
KCP&L Greater Missouri Operations Company)
Pursuant to 4 CSR 240-22)

File No. EO-2012-0324

MOTION TO EXTEND TIME PERIODS

COMES NOW KCP&L Greater Missouri Operations Company ("GMO"), pursuant to Missouri Public Service Commission ("Commission") Rule 4 CSR 240-22.080(15), and respectfully submits to the Commission its Motion To Extend Time Periods ("Motion"). In support of its Motion, GMO states as follows:

1. On April 9, 2012, GMO submitted its triennial compliance filing (“2012 IRP”) pursuant to Chapter 22 of the Commission’s regulations addressing GMO’s resource planning.

2. On September 6, 2012, the Staff of the Commission, the Office of the Public Counsel, the Missouri Department of Natural Resources ("MDNR") and Dogwood Energy, LLC submitted reports identifying concerns and in some cases alleging certain deficiencies regarding GMO's 2012 IRP, pursuant to 4 CSR 240-22.080(7) & (8). The MDNR also contracted with GDS Associates, Inc. to identify whether GMO's IRP filing complies with the provisions of the Electric Utility Resource Planning rules. Although the City of Kansas City, Missouri, the Midwest Energy Consumers Group, the Midwest Energy Users' Association, the Missouri Joint Municipal Electric Utility Commission and the Southern Union Company, d/b/a Missouri Gas Energy intervened in the case, they did not submit a report.

3. A portion of the Commission's resource planning regulations, 4 CSR 240-22.080(9) & (10), provide as follows:

(9) If the staff, public counsel, or any intervenor finds deficiencies in or concerns with a triennial compliance filing, it shall work with the electric utility and the other parties to reach, **within sixty (60) days of the date that the report**

or comments were submitted, a joint agreement on a plan to remedy the identified deficiencies and concerns. If full agreement cannot be reached, this should be reported to the commission through a joint filing as soon as possible **but no later than sixty (60) days after the date on which the report or comments were submitted**. The joint filing should set out in a brief narrative description those areas on which agreement cannot be reached. The resolution of any deficiencies and concerns shall also be noted in the joint filing.

(10) If full agreement on remedying deficiencies of concerns is not reached, then, **within sixty (60) days from the date on which the staff, public counsel, or any intervenor submitted a report or comments relating to the electric utility's triennial compliance filing**, the electric utility may file a response and the staff, public counsel, and any intervenor may file comments in response to each other. The commission will issue an order which indicates on what items, if any, a hearing will be held and which establishes a procedural schedule. (Emphasis added).

4. Commission Rule 4 CSR 240-22.080(15) provides: "The commission may extend or reduce any of the time periods specified in this rule for good cause shown."

5. Whereas the referenced reports or comments as described in 4 CSR 240-22.080 (9) & (10) were submitted on September 6, 2012 (paragraph 2, *supra*), the sixty (60) day filings required by said rule would be due on or before November 5, 2012.

6. GMO hereby advises the Commission that, while the parties have worked together attempting to reach a joint agreement on a plan to remedy the identified deficiencies and concerns, a brief extension of said time periods will be helpful and beneficial in allowing the parties to continue those discussions in attempting to reach a joint agreement or to narrow those areas on which agreement cannot be reached.

7. Accordingly, pursuant to 4 CSR 240-22.080(15), GMO respectfully submits that good cause exists for a two-week extension of the sixty (60) day time periods set forth in the above-referenced sections 4 CSR 240-22.080(9) & (10). Such a two-week extension would result in said filings being due on or before November 19, 2012.

8. GMO has contacted all of the above-named parties and states that it is authorized to advise the Commission that no party opposes the two-week extension of time requested herein.

WHEREFORE, KCP&L Greater Missouri Operations Company respectfully submits its Motion and requests that the Commission extend the sixty (60) day time periods referenced in 4 CSR 240-22.080(9) & (10) by two-weeks, resulting in said filings being due on or before November 19, 2012.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, First Class mail, postage prepaid, this 2nd day of November, 2012, to all counsel of record in this matter.

/s/ Larry W. Dority
Larry W. Dority