

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

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company) Case No. ER-2010-0356
for Approval to Make Certain Changes in its)
Charges for Electric Service)

**MOTION FOR EXPEDITED CONSIDERATION AND
APPROVAL OF TARIFF SHEETS FILED IN COMPLIANCE WITH
COMMISSION ORDER ON LESS THAN THIRTY DAYS' NOTICE**

COMES NOW KCP&L Greater Missouri Operations Company (“GMO”) and for its Motion for Expedited Consideration and Approval of Tariff Sheets Filed in Compliance with Commission Order on Less than Thirty Days’ Notice respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. On May 4, 2011, the Commission issued its *Report and Order* herein, authorizing GMO to increase its annual revenues by approximately \$59,436,131.¹ Among other things, the *Report and Order* directs GMO to file by May 12, 2011, revised tariff sheets that comport with the *Report and Order*. (*Report and Order*, Ordered Paragraph 3, p. 220)

2. GMO filed its tariffs on May 12, 2011. However, the Staff of the Commission has requested changes to certain FAC tariff sheets. GMO refiled these tariff sheets (P.S.C. MO. No. 1, Sheet Nos. 127.6, 127.7, 127.8, 127.9 and 127.10) on May 16, 2011.

3. GMO respectfully requests expedited approval of its tariff sheets. Specifically, GMO requests an effective date of June 4, 2011. Section 393.140(11) provides that “The commission for good cause shown may allow changes without requiring the thirty days’ notice under such conditions as it may prescribe.” To show good cause for approval of the revised

¹ See Staff’s Fourth Response To Order Directing Filing (filed May 11, 2011). GMO notes that it will also be filing a *Motion For Clarification And Application For Rehearing of KCP&L Greater Missouri Operations Company*, which if granted, could modify the total amount of the authorized revenue requirement and result in the need to modify some of the tariffs filed on May 12, 2011.

tariff sheets to be effective for electric service rendered on and after June 4, 2011, GMO states that the tariff sheets have been filed as directed by the Commission's *Report and Order* herein and are intended to establish just and reasonable rates, as determined by the Commission.

4. GMO initiated this rate proceeding on June 4, 2010, by the filing of tariff sheets that bore a proposed effective date of May 4, 2011. As noted in the *Report & Order*, GMO voluntarily extended the tariff effective date until June 4, 2011. (*Report & Order*, p. 8)

5. Should the Commission deny this motion and delay the effectiveness of the revised tariff sheets GMO has filed in compliance with the *Report and Order* beyond June 4, 2011, GMO will be denied recovery of a certain portion of the rate relief to which the Commission has already found GMO to be entitled. This would be unlawful, unjust, unreasonable, confiscatory and, in GMO's opinion, a result not intended by the Commission. There will be no negative effect on GMO's customers or the general public if the Commission grants this motion and approves the tariff sheets to be effective on and after June 4, 2011.

WHEREFORE, GMO respectfully requests that the Commission grant the Motion for Expedited Consideration and Approval of Tariff Sheets Filed in Compliance with Commission Order on Less than Thirty Days' Notice and approve the tariff sheets GMO has filed on May 16, 2011, to be effective for service rendered on and after June 4, 2011.

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 all parties of record this 16th day of May, 2011.

/s/ Roger W. Steiner _____

Roger W. Steiner