

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

In the Matter of Kansas City Power & Light Company's Request for Authority to Implement A General Rate Increase for Electric Service)	
)	Case No. ER-2014-0370
)	
Staff of the Public Service Commission of the State of Missouri,)	
)	
Petitioner,)	
v.)	Case No. EU-2015-0094
)	
Kansas City Power & Light Company,)	
)	
Respondent.)	

JOINT MOTION TO CONSOLIDATE CASES

COME NOW Kansas City Power & Light Company ("KCP&L" or "Company") and the Staff of the Missouri Public Service Commission ("Commission") ("Staff") and for their Joint Motion to consolidate cases, state:

1. On October 9, 2014, Staff filed a petition in Case No. EU-2015-0094 ("0094 Docket") seeking an order from the Commission directing KCP&L to record a regulatory liability in the amount of \$7,019 per day commencing on May 16, 2014, on account of an allowance currently included in the Company's rates for fees KCP&L is no longer paying to the Department of Energy ("DOE") related to spent nuclear fuel storage.
2. On October 30, 2014, KCP&L filed a general rate case with the Commission, Case No. ER-2014-0370 ("Pending Rate Case").
3. KCP&L and Staff believe that the issues regarding the DOE fees raised in the 0094 Docket can most efficiently be addressed in KCP&L's Pending Rate Case. The issue of whether the Commission should order KCP&L to defer and record a regulatory liability for the

subject DOE fees as well as what, if any, ratemaking treatment should be afforded to deferrals recorded pursuant to such an order are best addressed in KCP&L's Pending Rate Case. The Commission has authority to consolidate pending actions involving related questions of law or fact under 4 CSR 240-2.110(3).

4. KCP&L agrees that it will not assert that deferral or ratemaking treatment of the subject DOE fees for the period May 16 through December 31, 2014, is improper or impermissible due to the fact that the Commission had not issued an order directing deferral of the subject DOE fees prior to the closing of KCP&L's books for calendar year 2014. KCP&L may contest ratemaking treatment of the subject DOE fees on any other grounds.

WHEREFORE, KCP&L and Staff request that the Commission grant this Joint Motion to Consolidate Cases.

Respectfully submitted,

/s/ Robert J. Hack

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STAFF OF THE MISSOURI PUBLIC SERVICE
COMMISSION

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, this 19th day of January, 2015, to all parties of record.

/s/ Robert J. Hack

Robert J. Hack