

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

In the Matter of the Kansas City Power &	)	
Light Company's Smart Grid Demonstration	)	<b><u>Case No. ET-2012-</u></b>
Tariff.	)	Tariff File No. JE 2012-0101

**STAFF'S MOTION TO SUSPEND TARIFF  
AND MOTION FOR EXPEDITED TREATMENT**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion to Suspend Tariff and Motion for Expedited Treatment*, states as follows:

1. Kansas City Power & Light Company ("KCPL") is a Missouri general business corporation in good standing, with its principal place of business located at 1201 Walnut Street, Kansas City, Missouri 64106. Its registered agent is National Registered Agents, Inc., 300-B East High Street, Jefferson City, Missouri 65101.

2. KCPL is an integrated electric utility that generates electricity and distributes it to customers within a monopoly service area located in Missouri and Kansas.

3. KCPL is thus an electrical corporation and a public utility within the intendments of § 386.020, RSMo, and is subject to regulation by this Commission.

4. KCPL filed its proposed Advanced Metering Infrastructure (AMI) Home Area Network Pilot Program (HAN) tariff sheets on **August 31, 2011**, with an effective date of **September 30, 2011**.

5. During Staff's review of KCPL's proposed tariff sheets, KCPL notified

Staff of certain discrepancies between its intended implementation and the proposed tariff sheets, such that Staff is of the opinion that it would be contrary to the public interest for the tariff sheets to become effective by operation of law. Attached hereto as Exhibit A is Staff's Memorandum recommending suspension.

6. Because the effective date of the proposed tariff sheets is imminent, expedited treatment of Staff's motion is required to protect the public interest.

**WHEREFORE**, Staff prays that the Commission will grant expedited treatment to its motion and will **SUSPEND** KCPL's Advanced Metering Infrastructure (AMI) Home Area Network Pilot Program (HAN) tariff sheets in order to permit proceedings concerning the propriety thereof; and will grant such other and further relief as is just in the circumstances.

Respectfully submitted,

s/ Kevin A. Thompson  
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### **Certificate of Service**

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this **27<sup>th</sup> day of September, 2011**, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

s/ Kevin A. Thompson