

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

In the Matter of Kansas City Power & Light            )  
Company’s Notice of Intent to File an                )  
Application for Authority to Establish a Demand-    )  
Side Programs Investment Mechanism                 )  
File No. EO-2019-0132

In the Matter of KCP&L Greater Missouri            )  
Operations Company’s Notice of Intent to File an    )  
Application for Authority to Establish a Demand-    )  
Side Programs Investment Mechanism                 )  
File No. EO-2019-0133

**LIST OF ISSUES, LIST AND ORDER OF WITNESSES,  
ORDER OF OPENING STATEMENTS AND  
ORDER OF CROSS-EXAMINATION**

COMES NOW Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively, the “Company”), on behalf of itself, the Staff of the Missouri Public Service Commission (“Staff”), the Office of the Public Counsel (“OPC”), Missouri Division of Energy (“DE”), Natural Resources Defense Council (“NDRC”), National Housing Trust (“NHT”), Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”), City of St. Joseph, Missouri (“St. Joseph”), Midwest Energy Consumers Group (“MECG”), and Spire Missouri, Inc. (“Spire”), and, known collectively herein as “the Parties,” and hereby submits the following *List of Issues, List and Order of Witnesses, Order of Opening Statements and Order of Cross- Examination*:

**LIST OF ISSUES**

1. Should the Commission approve, reject, or modify the Company’s MEEIA Cycle 3 Plans (“MEEIA 3”), along with the waivers in the Company’s application intended to enable its implementation?
  - a. If MEEIA 3 should be modified, how should the plans be modified?
2. When it developed MEEIA 3, did the Company value demand-side investments

equal to traditional investments in supply and delivery infrastructure?

3. Is the proposed MEEIA 3, as designed by the Company, expected to provide benefits to all customers in the customer class in which the programs are proposed, regardless of whether the programs are utilized by all customers?
4. If the Commission approves or modifies MEEIA 3, what DSIM provisions should be approved to align recovery with the MEEIA statute?
5. Should Opt-Out Customers be eligible to participate in Business Demand Response programs?
  - a. MEEG sub issue: “Should GMO be required to publish in its tariff the participation payment to customers that participate in the Business Demand Response programs?”

#### **Order of Opening Statements**

KCP&L/GMO Staff  
OPC DE NRDC  
Renew Missouri  
NHT  
St. Joseph  
MEEG  
Spire

#### **List and Order of Witnesses**

**9:00 a.m. Preliminary Matters and Opening Statements**

**10:00 a.m. Cross-Examination of Witnesses**

***Company Witnesses:***

Charles Caisley

Burton Crawford

Brian File

Tim Nelson

Mark Foltz

Darrin Ives

***Staff Witnesses:***

Natelle Dietrich

J. Luebbert

John A. Rogers

Tammy Huber

Brad J. Fortson

Kory J. Boustead

Dana Eaves

Byron M. Murray

Robin Kliethermes

Seoung Joun Won

***OPC Witness:***

Geoff Marke

***DE Witnesses:***

Martin R. Hyman

Jane E. Epperson

***NRDC Witnesses:***

Philip Mosenthal

***Renew Missouri Witness:***

James Owen

Mark Cayce

Philip Fracia

***NHT Witness:***

Annika Brink

**Order of Cross-Examination**

<b>Company Witnesses</b>	<b>Staff Witnesses</b>	<b>OPC Witness</b>
DE	OPC	Staff
NRDC	DE	DE
Renew Missouri	NRDC	NRDC
MECG	Renew Missouri	Renew Missouri
St. Joseph	MECG	MECG
NHT	St. Joseph	St. Joseph
Spire	NHT	NHT
OPC	Spire	Spire
Staff	Company	Company

  

<b>DE Witnesses</b>	<b>NRDC Witnesses</b>	<b>Renew Missouri</b>
NRDC	DE	DE
Renew Missouri	Renew Missouri	NRDC
MECG	MECG	MECG
St. Joseph	St. Joseph	St. Joseph
NHT	NHT	NHT
Spire	Spire	Spire
OPC	OPC	OPC
Staff	Staff	Staff
Company	Company	Company

  

<b>NHT Witness</b>
DE
Renew Missouri
MECG
St. Joseph
Westside
Spire
OPC
Staff
Company

**WHEREFORE**, KCP&L and GMO request on behalf of the Parties that the Commission will accept this List of Issues, List and Order of Witnesses, Order of Opening Statements and Order of Cross-Examination; and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Roger W. Steiner

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Attorneys for Kansas City Power & Light Company  
and KCP&L Greater Missouri Operations Company

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 17<sup>th</sup> day of September, 2019, to all counsel of record.

/s/ Roger W. Steiner

Roger W. Steiner