

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

In the Matter of the Determination of)
Carrying Costs for the Phase-In Tariffs)
of KCP&L Greater Missouri Operations)
Company.)
File No. ER-2012-0024

MOTION TO SUSPEND PROCEDURAL SCHEDULE

COMES NOW KCP&L Greater Missouri Operations Company (“GMO”), by and through counsel, and for its Motion to Suspend Procedural Schedule respectfully states as follows:

1. On July 22, 2011, the Commission issued its *Order Opening A New File And Adopting Procedural Schedule* in File No. ET-2012-0017, regarding the carrying costs used for developing the phase-in tariff schedules for GMO. As reflected in said Order, a procedural schedule proposed by participating parties in a previous procedural conference was adopted, as follows:

Direct Testimony (All Parties)	August 18, 2011
Rebuttal Testimony (All Parties)	September 16, 2011
Evidentiary Hearing	October 11, 2011.

2. On July 25, 2011, the Commission issued its *Notice Closing File* in File No. ET-2012-0017, stating that the “Commission has determined that this matter should be classified as a rate case rather than as a tariff case. Therefore, File No. ER-2012-0024 has been opened and will contain all filings that would have occurred in this file.” Referencing the Order discussed in Paragraph 1 above, the Notice further provided, *inter*

alia, that “[t]he procedural schedule adopted in that order is the procedural schedule for ER-2012-0024.” (Notice, page 1).

3. GMO and the Staff of the Commission have conferred on several occasions in an effort to resolve the limited issue in this proceeding of the carrying costs used for developing GMO’s phase-in tariff schedules. GMO, with the concurrence of the Staff and the Office of the Public Counsel, hereby requests that the procedural schedule in this matter be suspended at this time, to allow sufficient time for all parties to confer and discuss a potential settlement of this issue, rather than focusing on the preparation and filing of Direct Testimony due this Thursday, August 18.

WHEREFORE, for the foregoing reasons, GMO respectfully requests that the Commission suspend the current procedural schedule in this matter.

Respectfully submitted,

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ATTORNEYS FOR KCP&L GREATER
MISSOURI OPERATIONS COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been emailed, hand-delivered or mailed, First Class, U.S. Mail, postage prepaid this 16th day of August, 2011 to all counsel of record.

/s/Roger W. Steiner
Roger W. Steiner