

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

In the Matter of Missouri-American Water Company’s     )  
Request for Authority to Implement General Rate     )     File No. WR-2017-0285  
Increase for Water and Sewer Service Provided in     )  
Missouri Service Areas     )

**KANSAS CITY POWER & LIGHT COMPANY’S AND  
KCP&L GREATER MISSOURI OPERATIONS COMPANY’S RESPONSE  
TO PUBLIC COUNSEL’S OBJECTION AND RESPONSE TO MAWC’S  
PROCEDURAL SCHEDULE**

Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively “KCP&L/GMO”) hereby respond to the *Office of Public Counsel’s Objection and Response to MAWC’s Procedural Schedule* (“OPC Objection”) filed in this docket on September 1, 2017.

1. In the OPC Objection, OPC criticized MAWC’s proposal to have the non-utility parties be directed to respond to MAWC’s direct testimony at the same time as those non-utility parties file “direct testimony” by pointing to the procedural schedule used in KCP&L’s recent rate case, File No. ER-2016-0285. (OPC Objection, p. 9). In so doing, OPC seems to be suggesting that KCP&L supports Missouri’s practice of having Staff and other parties file “direct testimony” which does not respond to the public utility’s case-in-chief, but instead provides their own “direct” case. As MAWC has demonstrated, Missouri’s practice is considerably different than rate case procedures used in other states (*e.g.*, Arkansas, Illinois, Indiana, Kansas, Kentucky, Maryland, Nebraska, New Jersey, New York, Oklahoma, Pennsylvania, Tennessee, Virginia and West Virginia), and results in inefficiency, complexity and expense in the rate case process that is not justified by corresponding benefits. (MAWC’s Response to Staff Suggestions in Opposition to Motion for Variance, p. 3 and Appendices A-O).

2. Lest the record be confused by OPC’s assertions in OPC’s Objection, KCP&L and GMO wish to clarify that in the past they have supported efforts to streamline Missouri’s rate case

process in a manner similar to the suggestions of MAWC in this case. (See KCPL/GMO's Comments, In the Matter of a Working Case to Consider Proposals to Create a Revenue Decoupling Mechanism for Utilities, pp. 3-4, Case No. AW-2015-0282).

3. In this proceeding, KCP&L and GMO believe it would be appropriate for the Commission to adopt MAWC's proposed procedural schedule as a reasonable and appropriate effort to make the regulatory process in Missouri more efficient, less complex and less costly.

WHEREFORE, KCP&L and GMO respectfully request that the Commission consider this Response to OPC's Objection and issue an order adopting MAWC's proposed procedural schedule in the above-captioned matter.

Respectfully submitted,

*/s/ Roger W. Steiner*

---

Robert J. Hack, MBN 36496

Phone: (816) 556-2791

E-mail: [rob.hack@kcpl.com](mailto:rob.hack@kcpl.com)

Roger W. Steiner, MBN 39586

Phone: (816) 556-2314

E-mail: [roger.steiner@kcpl.com](mailto:roger.steiner@kcpl.com)

Kansas City Power & Light Company

1200 Main Street, 19<sup>th</sup> Floor

Kansas City, Missouri 64105

Fax: (816) 556-2110

**Attorneys for Kansas City Power & Light  
Company and 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 counsel of record in this case this 6<sup>th</sup> day of September, 2017.

*/s/ Roger W. Steiner*

\_\_\_\_\_  
Roger W. Steiner