

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

In the Matter of a Proposed Amendment to)	
Commission Rule 4 CSR 240-2.090)	File No. AX-2014-0193
Regarding Data Requests)	

**COMMENTS OF KANSAS CITY POWER & LIGHT COMPANY AND
KCP&L GREATER MISSOURI OPERATIONS COMPANY
TO PROPOSED RULEMAKING**

COMES NOW Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (collectively, the “Companies”) and hereby submits comments to the Missouri Public Service Commission’s (“Commission”) Proposed Rules published in the *Missouri Register* on March 3, 2014. The Commission is promulgating proposed rules 4 CSR 240-2.090, and known as Discovery and Prehearings. The Companies respectfully request that the Commission consider these comments prior to taking further steps to finalize the rules.

General Comments

The Companies generally support the changes proposed to the rule with the exception of new paragraph H. While the Companies usually respond to Staff data requests in the Commission’s Electronic Filing and Information System (“EFIS”) there are instances where submitting the responses in EFIS is not workable. For example, if the response is voluminous, the Company will overnight the information on disc to Staff due to the size constraints of 20MB. Staff’s addition of paragraph H makes submission in EFIS mandatory and therefore problematic to the Companies when EFIS cannot be used. The Companies suggest replacing the word “shall” with “may” in order to solve the problem.

Conclusion

The Companies respectfully request that the Commission consider the foregoing comments when finalizing the proposed rules addressed herein.

Respectfully submitted,

/s/ Roger W. Steiner

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 2nd day of April, 2014.

/s/ Roger W. Steiner

Roger W. Steiner