

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                )     File No. EO-2019-0132  
Application for Authority to Establish a Demand- )  
Side Programs Investment Mechanism                )

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

**NRDC’S OBJECTION TO MOTION TO SUSPEND PROCEDURAL SCHEDULE**

Comes now the Natural Resources Defense Council (“NRDC”), and pursuant to 4  
CSR 240-2.080, states:

1.     On Friday, January 25, 2019, at 4:45 p.m., NRDC received service of the  
Company’s Motion to Suspend Procedural Schedule accompanied by an email stating,  
“The Company, Staff and OPC believe that there is merit in suspending the MEEIA 3  
procedural schedule in order to discuss the potential extension of MEEIA 2 programs for  
an additional year. Please review the attached and let the group know your position. We  
anticipate filing the motion by 10:00 am on Jan. 28.”

2.     NRDC was granted leave to intervene in these consolidated cases and has  
gone to the time, trouble and expense of preparing to file rebuttal testimony this same  
January 28 according to the Commission’s Order of December 14, 2018, amending the  
original schedule.

3.     Movants ostensibly seek an extension that would have rebuttal testimony

due on February 13. In reality, the request is to cancel the MEEIA Cycle 3 application altogether, extend Cycle 2 for an additional year, and file another application then. NRDC was apprised of this momentous decision only at the last minute, without consultation or opportunity for input.

4. The interests for which NRDC sought and was granted intervention have not been considered or honored by this process.

WHEREFORE, the Natural Resources Defense Council objects to the Motion to Suspend Procedural Schedule

/s/ Henry B. Robertson  
Henry B. Robertson (Mo. Bar No. 29502)  
Great Rivers Environmental Law Center  
319 N. Fourth St, Suite 800  
St. Louis, Missouri 63102  
(314) 231-4181  
(314) 231-4184  
[hrobertson@greatriverslaw.org](mailto:hrobertson@greatriverslaw.org)

Attorney for NRDC

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 28th day of January, 2019, to all counsel of record.

/s/ Henry B. Robertson  
Henry B. Robertson