BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

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In the Matter of Kansas City Power & Light Company's Application for Approval of Demand-Side Programs and For Authority to Establish A Demand-Side Programs Investment Mechanism

Case No. EO-2014-0095

KANSAS CITY POWER & LIGHT COMPANY'S MOTION TO SUSPEND PROCEDURAL SCHEDULE AND MOTION FOR EXPEDITED TREATMENT

COMES NOW Kansas City Power & Light Company ("KCP&L"), and files this *Motion to Suspend Procedural Schedule* with the Missouri Public Service Commission ("Commission") and states as follows:

1. On February 26, 2014, the Commission issued its *Order Modifying Procedural Schedule And Granting Variance* which, *inter alia*, scheduled the filing of positions statements¹ and scheduled hearings for April 28-29, 2014.

2. Settlement discussions have been ongoing among the parties², including Staff and Public Counsel. KCP&L is hopeful that this matter will be resolved through a stipulation and agreement among the parties. However, additional time is necessary to determine if it will be possible to resolve this matter without the need for a hearing.

3. KCP&L hereby recommends the Commission indefinitely suspend the procedural schedule, pending further settlement discussions. The parties also agree and request that the Commission find good cause to waive the requirement in 4 CSR 240-2.115(B) that objections to the April 17, 2014 Non-Unanimous Stipulation and Agreement be filed with seven days of April

¹ Position Statements were scheduled for filing on April 22, 2014 and extended to April 23, 2014.

² A *Non-Unanimous Stipulation And Agreement Resolving KCP&L's MEEIA Filing* was filed on April 17, 2014. This pleading was signed by KCP&L, the Missouri Division of Energy, Natural Resources Defense Council, and Earth Island Institute d/b/a Renew Missouri.

17 and toll the running of the seven-day period until a subsequent agreement is filed and ruled upon by the Commission, or until such time as KCP&L requests new hearing dates pursuant to Paragraph 4, herein.

4. In the event it appears that an evidentiary hearing will be required, KCP&L will inform the Commission and request alternative hearing dates for the evidentiary hearings.

5. KCP&L also respectfully requests that the Commission act expeditiously on this request since position statements are due today, and the hearings are currently scheduled to begin on Monday, April 28, 2014.

6. Staff, Public Counsel, Missouri Division of Energy, Earth Island Institute d/b/a Renew Missouri, Sierra Club, Natural Resources Defense Council, Midwest Energy Consumers Group, The Empire District Electric Company, and Union Electric Company d/b/a Ameren Missouri have indicated that they do not oppose this motion.³

WHEREFORE, KCP&L respectfully requests that the Commission indefinitely suspend the procedural schedule on an expedited basis, pending further settlement discussions.

> <u>/s/ Roger W. Steiner</u> Roger W. Steiner MBN #39586 Corporate Counsel Kansas City Power & Light Company 1200 Main Street, 16th Floor Kansas City, MO 64105 Telephone: (816) 556-2314 Facsimile: (816) 556-2787 E-Mail: Roger.Steiner@kcpl.com

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³ Other parties to this proceeding, including Brightergy, LLC, MC Power Companies, Inc. and the Missouri Industrial Energy Consumers, have been informed by email of this motion. However, they have not expressed a position or participated in the development of this request.

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ATTORNEYS FOR KANSAS CITY POWER & LIGHT 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 parties of record this 23rd day of April, 2014.

/s/ Roger W. Steiner Roger W. Steiner