

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

In the Matter of KCP&L Greater Missouri	) File No. ER-2016-0156
Operations Company’s Request for Authority	)
to Implement a General Rate Increase for	) Tracking No. YE-2016-0223
Electric Service	)

**MOTION FOR RECONSIDERATION**

COMES NOW the Midwest Energy Consumers Group (“Applicants” or “MECG”), pursuant to 4 CSR 240-2.160 of the Missouri Public Service Commission’s Rules of Practice and Procedure, and for its Motion for Reconsideration:

1. On February 23, 2016, KCP&L-Greater Missouri Operations Company (“GMO”) filed tariff sheets initiating a general rate increase. As required by statute, those tariff sheets reflected a 30-day effective date of March 24, 2016.

2. Historically the Commission has suspended tariff sheets for the full period of time provided by Section 393.150. Therefore, rates became effective after approximately 11 months. In an *Order Directing Notice / Ordering Directing Filing* issued on February 25, 2016, however, the Commission hinted that it may suspend GMO’s tariffs for a period that would complete this case in only 10 months. In those Orders, the Commission asked interested parties to file comments to the contemplated suspension period by Tuesday, March 1 and appear for discussion at the Commission’s March 2 agenda meeting.

3. MECG welcomes the opportunity to provide comments regarding the appropriate suspension period for this case. That said, the Commission’s Orders contemplate an expedited pleading schedule that is unworkable. Specifically,

undersigned counsel is out of town this weekend and meeting with clients on Tuesday / Wednesday of next week. As such, MECG, the primary representative of industrial / commercial customers in the recent KCPL and GMO rate cases will likely be unable to meet the Commission's expedited comment schedule.

4. MECG notes that any Commission decision regarding suspension needs to be made by Wednesday, March 23, prior to the tariffs becoming effective on March 24. As such, MECG suggests that the Commission simply push back the comment schedule one week to allow for comments by March 8, 2016 with an agenda discussion to be held on Wednesday, March 9. This would still allow the Commission three agenda sessions (March 9, March 16 and March 23) to discuss the appropriate suspension period and issue an order. Such a short delay would allow parties to provide a more thorough discussion of this important policy decision and would allow further interested parties to be identified and to intervene in this proceeding.

WHEREFORE, MECG respectfully requests that the Commission reconsider its February 25, 2015 *Order Directing Notice / Order Directing Notice* and allow for interested parties to file comments by Tuesday, March 8 with an agenda discussion on March 9.

Respectfully submitted,



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ATTORNEY FOR THE MIDWEST  
ENERGY CONSUMERS GROUP

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.



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David L. Woodsmall

Dated: February 26, 2016