

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

In the Matter of Kansas City)	
Power & Light Company's Request)	Case No. ER-2014-0370
for Authority to Implement a General)	
Rate Increase for Electric Service)	

MOTION FOR RECONSIDERATION

COMES NOW the Midwest Energy Consumers' Group ("MECG"), Missouri Industrial Energy Consumers ("MIEC") and the Office of the Public Counsel ("OPC"), pursuant to 4 CSR 240-2.160 of the Commission's Rules of Practice and Procedure, and for their Motion for Reconsideration of the Commission's March 11, 2015 Order Amending Procedural Schedule in this case, respectfully state as follows:

1. On December 12, 2014, the Commission issued its Order Setting Procedural Schedule and Establishing Test Year and Other Procedural Requirements ("Procedural Schedule Order"). In that Procedural Schedule Order, the Commission adopted a procedural schedule that was proposed and agreed upon by all the parties in this proceeding. That schedule carefully balanced the parties' needs to conduct discovery and have adequate time for the preparation of testimony. Specifically, the schedule adopted in the Procedural Schedule Order provided for the filing of surrebuttal testimony (June 5, 2015) and Position Statements (June 11, 2015).

2. Three months later, on March 11, 2015, the Commission issued its Order Amending Procedural Schedule ("Amended Order"). In that Amended Order, the Commission stated that it was "concerned that this schedule provides insufficient time for the Commission to consider the position statements of the parties before the evidentiary

hearing begins.” Given this stated concern, the Commission moved the date for the filing of Position Statements to June 8, 2015. Inexplicably, however, the Commission also modified the carefully balanced schedule and advanced the date for filing of surrebuttal testimony from June 5, 2015 to May 29, 2015.

3. MECG, MIEC and OPC have no problem with the Commission’s stated desire to have position statements at an earlier date. Having such statements in advance of the hearing furthers the Commission’s stated goal of being able to consider those statements in advance of the hearing. That said, however, MECG, MIEC and OPC are concerned with the Commission’s decision to go a step further and advance the filing of surrebuttal testimony. As indicated, the original schedule was agreed upon by all parties and considers the time necessary to conduct discovery on rebuttal testimony, consider that discovery and then utilize that discovery in the preparation of surrebuttal testimony. Relying upon this procedural schedule, MECG, MIEC and OPC have retained consultants and ensured that those consultants could abide by the schedule in the Procedural Schedule Order.

4. Any decision to expedite the dates for the filing of testimony always works to the benefit of the utility – as the party possessing the information that is to be considered by the parties and the Commission. Such information is not readily forthcoming, but requires time consuming discovery. As such, the Commission’s decision to eliminate a week of preparation time for the filing of surrebuttal testimony results in an advantage to KCPL and hinders the other parties’ ability to conduct thorough discovery on the rebuttal testimony to be filed by KCPL on May 7, 2015.

WHEREFORE, MECG, MIEC and OPC respectfully request that the Commission reconsider its Order Amending Procedural Schedule and return the date for the filing of surrebuttal to June 5, 2015.

Respectfully submitted,



David L. Woodsmall (#40747)
Woodsmall Law Office
308 E. High Street, Suite 204
Jefferson City, Missouri 65101
(573) 636-6006
(573) 636-6007 FAX
david.woodsmall@woodsmalllaw.com

ATTORNEY FOR THE MIDWEST
ENERGY CONSUMERS' GROUP

/s/ Marc D. Poston
Marc D. Poston (#45722)
Chief Deputy Counsel
P. O. Box 2230
Jefferson City MO 65102
(573) 751-5558
(573) 751-5562 FAX
marc.poston@ded.mo.gov

OFFICE OF THE PUBLIC COUNSEL

/s/ Diana Vuylsteke
Diana M. Vuylsteke (# 42419)
211 N. Broadway, Suite 3600
St. Louis, Missouri 63102
Telephone: (314) 259-2543
Facsimile: (314) 259-2020
E-mail: dmvuylsteke@bryancave.com

ATTORNEY FOR THE MISSOURI
INDUSTRIAL ENERGY CONSUMERS

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.

A handwritten signature in black ink, appearing to read "David L. Woodsmall". The signature is written in a cursive, somewhat stylized font.

David L. Woodsmall

Dated: March 19, 2015