

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

In the Matter of Veolia Energy Kansas City, Inc.)
For Authority to File Tariffs to Increase Rates)

Case No. HR-2011-0241

**KANSAS CITY POWER & LIGHT COMPANY’S
MOTION FOR EXTENSION OF TIME**

COMES NOW, Kansas City Power & Light Company (“KCP&L” or “Company”) and hereby requests the Commission grant an extension until August 26, 2011 to file its direct testimony regarding revenue requirement. In support of its motion, KCP&L states:

1. Under the procedural schedule adopted by the Commission in this case, revenue requirement direct testimony is due to be filed by Staff and Intervenors on August 8, 2011 with rate design testimony due August 26, 2011.

2. KCP&L is unable to meet the deadline for its revenue requirement direct case due to the unreasonable delay of Veolia in responding to data requests and providing workpapers. KCP&L requested the Veolia responses to all of staff data requests on May 27, 2011. Requesting a utility’s responses to staff data requests is a common practice in rate cases and allows the requestor an efficient way to access relevant information. Even after a KCP&L Motion to Compel was granted by the Commission on July 18, 2011, Veolia still has not provided over twenty of the responses. The Commission’s July 18 order was clear; Veolia was to complete compliance with KCP&L’s data request no later than July 22, 2011. The Commission should not permit Veolia to ignore its order.

3. In addition, Veolia has not timely provided its direct case workpapers to KCP&L. Contrary to the Commission's May 2, 2011 order, Veolia did not automatically provide these workpapers to KCP&L. In order to get this much needed information, KCP&L submitted a data request on July 8, 2011 for these workpapers. Despite the fact that these workpapers had already been provided to staff and did not need to be created by Veolia, KCP&L did not receive these workpapers until July 30, 2011. KCP&L's initial review of these workpapers indicates that all of the information, especially regarding class cost of service, needed to evaluate Veolia's case may not have been included. By not providing these workpapers promptly, Veolia has prevented KCP&L from understanding Veolia's direct case.

4. As indicated above, the actions and delay of Veolia have seriously disadvantaged KCP&L in its preparation of its testimony. KCP&L requests that the Commission permit KCP&L to file its revenue requirement direct testimony on the same day as the rate design testimony is due (August 26).

5. The relief requested by KCP&L should not require any other modifications¹ to the procedural schedule as the procedural schedule provides for rebuttal testimony on all issues on September 16, 2011. Granting this motion is one way the Commission can indicate to Veolia that it must take the Commission's discovery orders seriously.

¹ The Company reserves the right, however, to ask for future modifications, should other discovery issues with Veolia occur.

WHEREFORE, for the above-stated reasons, KCP&L respectfully requests that the Commission allow KCP&L to file its direct testimony on August 26, 2011.

Respectfully submitted,

/s/ Roger W. Steiner

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ATTORNEYS FOR
KANSAS CITY POWER & LIGHT COMPANY

Dated: August 3, 2011

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, this 3rd day of August, 2011 to all counsel of record in this case.

/s/ Roger W. Steiner

Roger W. Steiner