

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

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for)
Approval to Make Certain Changes in its Charges)
for Electric Service.)
File No. ER-2010-0356

MOTION TO ACCEPT LATE-FILED STAFF SCHEDULES

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and requests that the Missouri Public Service Commission (“the Commission”) accept three late-filed Staff testimony schedules. In support of this motion, Staff states as follows:

A. Schedule 4 to Staff Witness Cary G. Featherstone’s Direct Testimony

1. On November 17, 2010, Staff submitted in File No. ER-2010-0356 the direct testimony of Cary G. Featherstone. Among other items, this testimony contains a discussion of Staff’s position on the valuation of combustion turbines installed at or related to South Harper.

2. Specifically, on page 38 of this direct testimony, Staff witness Featherstone discusses Staff’s position on the valuation of three of the South Harper combustion turbines (“South Harper Turbines 1-3”). This position is supported by KCP&L Greater Missouri Operations Company’s response to Staff Data Request No. 38 received in Case No. EO-2005-0156. Although Staff witness Featherstone indicated in his direct testimony on page 39, lines 2-4 that this data request response was attached thereto as Schedule 3, this material was inadvertently omitted. The Schedule 3 that was attached to Staff witness Featherstone’s direct testimony contains documents related to Staff’s valuation of South Harper Prudent Turbines 4 and 5. Staff proposes that the document currently filed as Schedule 3 remain labeled as Schedule

3.

3. In order to correct the inadvertent omission with the least amount of confusion, Staff has attached to this pleading what it has labeled as Schedule 4 (Schedules 4-1 through 4-50 – HC in its entirety) to the direct testimony of Staff witness Featherstone. Staff requests that the Commission allow this schedule to be late-filed as an attached schedule to Staff witness Featherstone’s direct testimony in this case. If Staff’s request is granted, then in order to correct an incorrect reference found in Mr. Featherstone’s direct testimony at page 39, line 3, the reference at that point to “Schedule 3” should be changed to refer to “Schedule 4.”

4. This filing is being made to remedy this inadvertent omission as soon as reasonably practicable after Staff discovered this inadvertent error.

5. Because this schedule was also a schedule to testimony Staff prefiled in the last general electric rate case of KCP&L Greater Missouri Operations Company, no party should be prejudiced by correcting this omission. In addition, this schedule pertains to an issue the Commission has ordered to be heard on February 15, 2011; therefore, the parties will have ample time to review the schedule prior to the presentation of this issue during the evidentiary hearing.

B. Schedules MSS-S1 and MSS-S2 to Staff Witness Michael S. Scheperle’s Surrebuttal Testimony

6. On January 13, 2011, Staff submitted in File No. ER-2010-0356 the surrebuttal testimony of Michael S. Scheperle. Among other items, this testimony compares the rate design recommendations of the parties offering such recommendations in this matter.

7. Specifically, on page 7 of this surrebuttal testimony, Staff witness Scheperle indicates that he has attached two schedules, MSS-S1 and MSS-S2, summarizing the revenue neutral results of the various rate design proposals. These schedules were inadvertently omitted.

8. Staff requests that the Commission allow these schedules to be late-filed as attached schedules to Staff witness Scheperle's surrebuttal testimony. The text of Mr. Schederple's testimony will not be affected by this request or by the Commission's approval of this request.

9. This filing is being made to remedy this inadvertent omission as soon as reasonably practicable after Staff discovered this inadvertent error.

10. Because these schedules are offered for submission one day after the filing of surrebuttal testimony in this case and pertain to an issue that the Commission has scheduled to be heard on February 18, 2011, no party will be prejudiced by correcting this omission.

WHEREFORE, Staff requests that the Commission accept (1) late-filed Schedule 4 (HC in its entirety) attached to this pleading as Schedule 4 to the direct testimony of Cary G. Featherstone, pre-filed in this case on November 17, 2010, and (2) late-filed Schedules MSS-S1 and MSS-S2 attached to this pleading as Schedules MSS-S1 and MSS-S2 to the surrebuttal testimony of Michael S. Scheperle, pre-filed in this case on January 12, 2011.

Respectfully submitted,

/s/ ERIC DEARMONT

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 13th day of January, 2011.

/S/ ERIC DEARMONT