

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

In the Matter of Kansas City Power & Light)
Company’s Notice of Intent to File an)
Application for Authority to Establish a Demand-) **File No. EO-2015-0240**
Side Programs Investment Mechanism)

In the Matter of KCP&L Greater Missouri Operations)
Company’s Notice of Intent to File an)
Application for Authority to Establish a Demand-) **File No. EO-2015-0241**
Side Programs Investment Mechanism)

MOTION TO EXTEND PROCEDURAL SCHEDULE

COME NOW the Staff of the Missouri Public Service Commission, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company and Brightergy, LLC (collectively the “Signatories”), by and through undersigned counsel, and hereby file their Motion To Extend Procedural Schedule. In support thereof, the Signatories state:

1. On September 23, 2015, the Commission issued its *Order Establishing Procedural Schedule And Other Procedural Requirements* which approved the following procedural schedule:

- Rebuttal Testimony October 14, 2015
- Surrebuttal Testimony October 27, 2015
- List Issues, Order of Witnesses/Cross October 28, 2015
- Position Statements October 29, 2015
- Evidentiary Hearing November 3-5, 2015
- Briefs November 20, 2015

2. The parties to this proceeding have been conducting technical conferences and settlement discussions which have proved to be productive. In order to facilitate additional

settlement discussions, the Signatories believe that an extension of the current procedural schedule would be appropriate, as described below.

3. The Signatories request that the Commission revise the procedural schedule as follows:

	<u>Current</u>	<u>Proposed</u>
• Rebuttal Testimony	Oct. 14, 2015	Oct. 21, 2015
• Surrebuttal Testimony	Oct. 27, 2015	Nov. 2, 2015
• List Issues, Order of Witnesses/Cross	Oct. 28, 2015	Nov. 3, 2015
• Position Statements	Oct. 29, 2015	Nov. 4, 2015
• Evidentiary Hearing	Nov. 3-5, 2015	Nov. 5-6, 2015
• Briefs	Nov. 20, 2015	Nov. 20, 2015
• Expected date of Order		Dec. 14, 2015

4. Missouri Industrial Energy Consumers, Earth Island Institute d/b/a Renew Missouri, the National Housing Trust, West Side Housing Organization, Union Electric Company d/b/a Ameren Missouri, Missouri Department of Economic Development-Division of Energy and United for Missouri, Inc. have indicated that they either support or have no objection to this motion.

WHEREFORE, the Signatories respectfully request the Commission accept its Revised Procedural Schedule as set forth above.

Respectfully submitted,

Attorney for the Staff of the
Missouri Public Service Commission

/s/ Robert S. Berlin

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Kansas City Power & Light Company and
KCP&L Greater Missouri Operations Company

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been electronically mailed this 6th day of October, 2015 to all counsel of record in this proceeding.

/s/ Roger W. Steiner

Roger W. Steiner