

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of)
Kansas City Power & Light Company's) File No. ER-2012-0174
Request for Authority to Implement)
a General Rate Increase for Electric Service)

MOTION TO ADMIT SIERRA CLUB EXHIBITS

Comes now the Sierra Club and in response to the Commission's "Order Setting Deadlines for Exhibits" states as follows:

1. The Sierra Club filed testimony which it designated Exhibit 925, Direct Testimony of Bruce E. Biewald, and Exhibit 926, Surrebuttal Testimony of Bruce E. Biewald.

2. In an email thread of October 16, 2012, attached hereto, the presiding officer and the parties agreed to stipulate these exhibits into evidence. No party objected, but Sierra Club has been unable to confirm that the exhibits were formally admitted.

WHEREFORE the Sierra Club prays the Commission to admit Exhibits 925 and 926 into the administrative record in this case.

/s/ Henry B. Robertson
Henry B. Robertson (Mo. Bar No. 29502)
Great Rivers Environmental Law Center
705 Olive Street, Suite 614
St. Louis, Missouri 63101
(314) 231-4181
(314) 231-4184
hrobertson@greatriverslaw.org

Attorney for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was sent by email on this 4th day of January, 2013, to all counsel of record:

/s/ Henry B. Robertson
Henry B. Robertson

Henry Robertson

From: "Jordan, Daniel" <daniel.jordan@psc.mo.gov>
To: "'Carl Lumley'" <CLumley@lawfirmemail.com>; "Blome, Jessica" <jessica.blome@ago.mo.gov>; "Mills, Lewis" <lewis.mills@ded.mo.gov>; "'Henry Robertson'" <hrobertson@greatriverslaw.org>
Cc: "Steve Jones" <sejcaj@kc.rr.com>; <Heather.Humphrey@kcpl.com>; "Karl Zobrist" <karl.zobrist@snrdenton.com>; "Williams, Nathan" <nathan.williams@psc.mo.gov>; "diana vuylsteke" <dmvuylsteke@bryancave.com>; <tleblanc@kcp.com>; <roger.steiner@kcpl.com>; "OPC Service" <OPCSERVICE@ded.mo.gov>; "lowery" <lowery@smithlewis.com>; <lisa.gilbreath@snrdenton.com>; <JFischerPC@aol.com>; <jfinnegan@fcplaw.com>; "Todd Jacobs" <todd.jacobs@sug.com>; "Doug Healy" <doug@healylawoffices.com>; <dcarter@brydonlaw.com>; <david.woodsmall@woodsmalllaw.com>; "GCO Internet Service – PSC" <gencounsel@psc.mo.gov>; "Dean Cooper" <dcooper@brydonlaw.com>; "Stu Conrad" <stucon@fcplaw.com>; "Mark Comley" <comleym@ncrpc.com>; "John Coffman" <john@johncoffman.net>; <amerenmoservice@ameren.com>; "Reed Bartels" <rbartels@bartelslaw.com>; "Young, Mary Ann" <MaryAnn.Young@dnr.mo.gov>
Sent: Tuesday, October 16, 2012 1:02 PM
Subject: RE: ER-2012-0174

I appreciate the quick responses, courtesy, and accommodation of the parties.

No further reply to this email string is required unless a party objects to the admission of the testimony into the record.

Any objection to the admission of the testimony as described below shall be made by reply to this email string no later than 4pm.

Unless some party objects, I intend to enter the testimony into the record.

Daniel Jordan,

Senior RLJ

Missouri Public Service Commission

Daniel.Jordan@psc.mo.gov

573-751-7485

From: Carl Lumley [mailto:CLumley@lawfirmemail.com]
Sent: Tuesday, October 16, 2012 1:55 PM
To: Blome, Jessica; Mills, Lewis; 'Henry Robertson'; Jordan, Daniel
Cc: Steve Jones; Heather.Humphrey@kcpl.com; Karl Zobrist; Williams, Nathan; diana vuylsteke; tleblanc@kcp.com; roger.steiner@kcpl.com; OPC Service; lowery; lisa.gilbreath@snrdenton.com; JFischerPC@aol.com; jfinnegan@fcplaw.com; Todd Jacobs; Doug Healy; dcarter@brydonlaw.com; david.woodsmall@woodsmalllaw.com; GCO Internet Service – PSC; Dean Cooper; Stu Conrad; Mark Comley; 'John Coffman'; amerenmoservice@ameren.com; Reed Bartels; Young, Mary Ann
Subject: RE: ER-2012-0174

Dogwood too

From: Blome, Jessica [mailto:jessica.blome@ago.mo.gov]
Sent: Tuesday, October 16, 2012 1:48 PM
To: 'Mills, Lewis'; 'Henry Robertson'; Jordan, Daniel
Cc: Steve Jones; Heather.Humphrey@kcpl.com; Karl Zobrist; Williams, Nathan; diana vuylsteke; tleblanc@kcp.com; roger.steiner@kcpl.com; OPC Service; Carl Lumley; lowery; lisa.gilbreath@snrdenton.com; JFischerPC@aol.com; jfinnegan@fcplaw.com; Todd Jacobs; Doug Healy; dcarter@brydonlaw.com; david.woodsmall@woodsmalllaw.com; GCO Internet Service - PSC; Dean

Cooper; Stu Conrad; Mark Comley; 'John Coffman'; amerenmoservice@ameren.com; Reed Bartels; Young, Mary Ann
Subject: RE: ER-2012-0174

MDNR would stipulate as well.

Jessica L. Blome
 Assistant Attorney General
 Agriculture & Environment Division
 P.O. Box 899 | Jefferson City, MO 65102
 P: 573.751.3640 | F: 573.751.8796
jessica.blome@ago.mo.gov



Please consider the environment before printing this email.

From: Mills, Lewis [<mailto:lewis.mills@ded.mo.gov>]
Sent: Tuesday, October 16, 2012 1:38 PM
To: 'Henry Robertson'; Jordan, Daniel
Cc: Steve Jones; Heather.Humphrey@kcpl.com; Karl Zobrist; Williams, Nathan; diana vuylsteke; tleblanc@kcp.com; roger.steiner@kcpl.com; OPC Service; Carl Lumley; lowery; lisa.gilbreath@snrdenton.com; JFischerPC@aol.com; jfinnegan@fcplaw.com; Todd Jacobs; Doug Healy; dcarter@brydonlaw.com; david.woodsmall@woodsmalllaw.com; GCO Internet Service - PSC; Dean Cooper; Stu Conrad; Mark Comley; 'John Coffman'; Blome, Jessica; amerenmoservice@ameren.com; Reed Bartels
Subject: RE: ER-2012-0174

As far as OPC is concerned, there is no need for Mr. Robertson to come all the way to Jeff City to seek admission of Mr. Biewald's testimony. I would be willing to stipulate to its admission.

From: Henry Robertson [<mailto:hrobertson@greatriverslaw.org>]
Sent: Tuesday, October 16, 2012 1:32 PM
To: Jordan, Daniel
Cc: Steve Jones; Heather.Humphrey@kcpl.com; Karl Zobrist; Williams, Nathan; diana vuylsteke; tleblanc@kcp.com; roger.steiner@kcpl.com; OPC Service; Carl Lumley; lowery; lisa.gilbreath@snrdenton.com; JFischerPC@aol.com; jfinnegan@fcplaw.com; Todd Jacobs; Doug Healy; dcarter@brydonlaw.com; david.woodsmall@woodsmalllaw.com; GCO Internet Service - PSC; Dean Cooper; Stu Conrad; Mark Comley; 'John Coffman'; Blome, Jessica; amerenmoservice@ameren.com; Reed Bartels
Subject: Re: ER-2012-0174

I should add that I intend to appear tomorrow and seek admission of the testimony at the outset. Is that acceptable? In the alternative I could appear on Thursday when the issue is heard.

Henry Robertson

----- Original Message -----

From: Jordan, Daniel
To: 'Henry Robertson'
Cc: Steve Jones ; Heather.Humphrey@kcpl.com ; [Karl Zobrist](mailto:Karl.Zobrist) ; [Williams, Nathan](mailto:Williams.Nathan) ; [diana vuylsteke](mailto:diana.vuylsteke) ; tleblanc@kcp.com ; roger.steiner@kcpl.com ; opc ; [Carl Lumley](mailto:Carl.Lumley) ; lowery ; lisa.gilbreath@snrdenton.com ; JFischerPC@aol.com ; jfinnegan@fcplaw.com ; [Todd Jacobs](mailto:Todd.Jacobs) ; [Doug Healy](mailto:Doug.Healy) ; dcarter@brydonlaw.com ;