

**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 of a Special Rate for a Facility) File No. EO-2019-0244
Whose Primary Industry is the Production or)
Fabrication of Steel in or Around Sedalia, Missouri.)

**KCP&L GREATER MISSOURI OPERATIONS COMPANY’S REPLY TO MECG’S RESPONSE TO
MOTION TO SUSPEND PROCEDURAL SCHEDULE**

COMES NOW KCP&L Greater Missouri Operations Company (“GMO”), and files its Reply To MECG’s Motion To Suspend Procedural Schedule filed on September 6, 2019 (“MECG’s Response”):

1. On Friday, September 6, 2019. GMO, Staff, and Nucor Steel Sedalia, LLC (“Nucor”) with the non-objection of the Office of the Public Counsel, filed a Motion To Suspend Procedural Schedule which requested that the procedural schedule be suspended until September 16 (7 days from now) to accommodate ongoing settlement discussions.

2. As explained in the testimony of GMO witness Darrin Ives, Nucor witness Kevin Van De Ven, and Jessica L. Craig, the Executive Director of the Economic Development Sedalia-Pettis County, attracting Nucor to Missouri is in the interest of both the State of Missouri and other GMO customers. As the largest GMO customer, Nucor will increase the sales of electricity for the utility, both to the plant itself and to new residents and businesses attracted to the Sedalia region by the Nucor plant, reducing the average rate paid by all customers. For the State of Missouri and the Sedalia region, this expansion will promote economic development, improving the tax base and providing new high paying employment opportunities.

3. GMO believes that the ongoing settlement discussions with Staff, Public Counsel, and Nucor have been productive, and it is hopeful that it will be able to reach an agreement with

some of the parties to this case that will allow for the approval of an electric rate that would accommodate Nucor's desire to be in operation in Sedalia, Missouri by January 1, 2019. A modest delay in the procedural schedule will promote this goal of reaching a settlement.

4 Contrary to the argument of MECG in its Response, MECG has no "moral right" to have Staff file rebuttal testimony on any particular date. MECG does not have the authority to dictate to Staff or any other party how it conducts its analysis of public utility applications. Ultimately, it will be the Commission, not the Staff, which determines a resolution of this case that promotes the public interest. Nor is it clear what GMO customer, if any, MECG is speaking for by opposing the modest delay in the procedural schedule sought by GMO, Staff, and Nucor.

5. The Commission should not countenance MECG's attempt to force Staff or any other party to file rebuttal testimony when it appears that it may be possible to reach a resolution of this matter that will promote the public interest.

WHEREFORE, GMO respectfully requests that the Commission grant the Non-unanimous Motion To Suspend Procedural Schedule filed by GMO, Staff and Nucor on September 6, 2019.

Respectfully submitted,

/s/ Roger W. Steiner

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**ATTORNEY FOR KCP&L GREATER
MISSOURI OPERATIONS COMPANY**

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 9th day of September 2019.

/s/ Roger W. Steiner

Roger W. Steiner