

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

In the Matter of KCP&L Greater Missouri Operations )  
Company Request for Authority to Implement Rate )  
Adjustments Required by 4 CSR 240-20.090(4) and ) File No. ER-2019-0198  
the Company's Approved Fuel )  
and Purchased Power Cost Recovery Mechanism )

In the Matter of the Application of KCP&L Greater )  
Missouri Operations Company Containing Its Semi- ) File No. ER-2019-0199  
Annual Fuel Adjustment Clause True-Up )

In the Matter of the Eighth Prudence Review )  
of Costs Subject to the Commission-Approved )  
Fuel Adjustment Clause of KCP&L Greater ) File No. EO-2019-0067  
Missouri Operations Company )

In the Matter of the Second Prudence Review )  
of Costs Subject to the Commission-Approved )  
Fuel Adjustment Clause of Kansas City Power and ) File No. EO-2019-0068  
Light Company )

**JOINT PROPOSED PROCEDURAL SCHEDULE, AND  
MOTION TO CONSOLIDATE CASES**

COME NOW Kansas City Power & Light Company (“KCPL”), KCP&L Greater Missouri Operations Company (“GMO”), the Office of the Public Counsel ("OPC"), and the Staff of the Missouri Public Service Commission ("Staff")(collectively “Parties”), and hereby submit the following Joint Proposed Procedural Schedule in response to the Commission’s *Order Suspending True-Up Timeline And Directing The Parties To File A Proposed Procedural Schedule* which was issued on February 27, 2019 in File Nos. ER-2019-0198 and ER-2019-0199. After further discussions, the Parties also recommend that all of the above-referenced files, File Nos. EO-2019-0067, EO-2019-0068, ER-2019-0198, and ER-2019-0199 be consolidated and processed using the procedural schedule discussed below:

1. On February 27, 2019, the Commission issued its *Order Suspending True-Up Timeline And Directing The Parties To File A Proposed Procedural Schedule* in File Nos. ER-2019-0198 and ER-2019-0199 which directed the parties to file a proposed procedural schedule by March 11, 2019. Subsequently, the Commission granted Staff, GMO and OPC's request to extend the filing deadline for the procedural schedule until March 18, 2019.

2. At present, there are also two FAC prudence reviews pending involving KCP&L Greater Missouri Operations Company (EO-2019-0067) and Kansas City Power & Light Company (EO-2019-0068). The Commission has scheduled a procedural conference in File No. EO-2019-0068 for March 26, 2019.<sup>1</sup> These cases involve related questions of law or fact<sup>2</sup>, and File Nos. EO-2019-0067, ER-2019-0198 and ER-2019-0199 involve related questions of law or fact<sup>3</sup>; therefore, the Parties recommend that Commission consolidate all four of these cases, and order a joint hearing of all issues to avoid unnecessary costs and delay.

3. Representatives of the Parties have consulted and hereby recommend the following procedural schedule for resolution of the issues in these cases:

Direct Testimony by KCPL and GMO—April 23, 2019

Rebuttal Testimony by Staff and OPC—June 6, 2019

Settlement Conference—June 10, 2019

Cross-Rebuttal Testimony by Staff and OPC<sup>4</sup>—July 22, 2019

Surrebuttal Testimony by KCPL and GMO<sup>5</sup>—August 5, 2019

List of Issues, Order of Witnesses, Opening Statements and Cross--August 11, 2019

Position Statements—August 13, 2019

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<sup>1</sup> If the Commission consolidates the cases as requested herein, this procedural conference may be canceled.

<sup>2</sup> There is a common issue involving purchase power agreements in File Nos. EO-2019-0067 and EO-2019-0068.

<sup>3</sup> There is a common issue involving auxiliary power and cost allocations in File Nos. ER-2019-0198, ER-2019-0199, and EO-2019-0067.

<sup>4</sup> Cross-Rebuttal Testimony to be filed by Staff and OPC only responds to Rebuttal Testimony filed by Staff and OPC.

<sup>5</sup> Surrebuttal Testimony filed by KCPL and GMO only responds to Rebuttal and Cross-Rebuttal Testimony.

Evidentiary Hearings—August 27, 2019

Initial Briefs—September 16

Reply Briefs—September 27, 2019

4 Other Procedural Matters

A. Discovery will be governed by the normal rules of the Commission found in 4 CSR 240-2.090.

B. The Parties shall provide all workpapers, in electronic format, whenever feasible, within two business days following the date on which the related testimony is filed.

C. Where workpapers or data request responses include models or spreadsheets or similar information originally in a commonly-available format where inputs or parameters may be changed to observe changes in inputs or outputs, if available in that original format, the party providing the workpaper or response shall provide this type of information in that original format.

D. All Parties shall provide copies of testimony, schedules, exhibits, and pleadings to other counsel of record by electronic means and in electronic form essentially concurrently with the filing of such testimony, schedules, exhibits, or pleadings where the information is available in electronic format. Parties shall not be required to put information that does not exist in electronic format into electronic format for purposes of exchanging it.

5. In order to implement the proposed procedural schedule, the Parties recognize that the Commission will need to suspend the timeline of the true-up in File No. ER-2019-0199 beyond June 29, 2019, the current end of the suspension period, and the Parties do not

object to a further suspension of the true-up timeline to allow for a decision in this matter utilizing the above-referenced procedural schedule.<sup>6</sup> To the extent the Commission deems it necessary to grant a variance from 4 CSR 240-20.090(5)(D) to suspend the true-up timeline beyond June 29, 2019, the Parties respectfully request that the Commission grant such a variance in order to promote the orderly adjudication of this proceeding.

**WHEREFORE**, the Parties respectfully request that the Commission consolidate these files, as discussed herein, and request that the Commission adopt the above-referenced procedural schedule for the consolidated case.

Respectfully submitted,

/s/ Robert J. Hack

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<sup>6</sup> The Parties contemplate that a Commission order in this proceeding will be issued no later than mid-November 2019, which would enable any necessary fuel adjustment rate (“FAR”) changes to be incorporated in GMO’s FAR filing to be made in late December 2019.

**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, to all parties of record this 18th day of March, 2019.

*/s/ James M. Fischer*

James M. Fischer