

**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.)

PROPOSED PROCEDURAL SCHEDULE

COMES NOW KCP&L Greater Missouri Operations Company (“GMO”) and, for its
Proposed Procedural Schedule:

PROPOSED PROCEDURAL SCHEDULE

1. GMO and Staff (“Staff”) for the Missouri Public Service Commission (“Commission”)(collectively, the “Parties”) request that the Commission adopt the following procedural schedule:

<u>Date</u>	<u>Event</u>
August 16, 2019	2 nd Technical Conference
August 27, 2019	Rebuttal Testimony
September 26, 2019	Surrebuttal Testimony
September 27, 2019	List of Issues
September 30, 2019	Position Statements
October 3-4, 2019	Evidentiary Hearings
October 25, 2019	Initial Post-Hearing Briefs
November 8, 2019	Post-Hearing Reply Brief
November 21, 2019 – December 4, 2019	Range of Anticipated Commission Order

DISCOVERY PROCEDURES

2. The Parties request that the Commission adopt the following procedures regarding discovery:

- a. All parties shall provide copies of testimony (including schedules), exhibits, and pleadings to other counsel of record by electronic means and in electronic form

essentially concurrently with the filing of such testimony, exhibits or pleadings where the information is available in electronic format. Parties are not required to put information that does not exist in electronic format into electronic format for purposes of exchanging it.

b. Parties shall make all reasonable efforts to not include confidential information in data requests. If confidential information must be included in data requests, the confidential information will be appropriately designated as such pursuant to 4 CSR 240-2.135.

c. Data requests issued to or by Staff shall be submitted and responded to in the Commission's Electronic Filing and Information System ("EFIS"), if feasible, or in electronic format on compact disc or by other means agreed to by counsel, if infeasible. Counsel for each party shall receive electronically from each other party serving a data request, an electronic copy of the text of the "description" of that data request contemporaneously with service of the data request. Regarding Staff-issued data requests, if the description contains confidential information, or is voluminous, a hyperlink to the EFIS record of that data request shall be considered a sufficient copy. If a party desires the response to a data request that has been served on another party, the party desiring a copy of the response must request a copy of the response from the party answering the data request. Data requests shall be sent by e-mail to counsel for the other parties. Counsel may designate other personnel to be added to the service list for data requests, but shall assume responsibility for compliance with any restrictions on confidentiality. Data request responses shall be served on counsel for the requesting party, unless waived by counsel, and on the requesting party's employee or representative who submitted the data

request, and shall be served electronically, if feasible and not voluminous as defined by Commission rule. KCP&L's responses to Staff data requests will be available to other parties on EFIS. In addition, KCP&L's responses to all parties' data requests will be available for review on CaseWorksEX for parties who complete the requirements for accessing the CaseWorksEX system.

d. The response time for all data requests shall be 15 calendar days, and 5 calendar days to object or notify that more than 15 calendar days will be needed to provide the requested information. Data requests sent after 5:00 pm will be considered served on the next business day. The Commission may rule on discovery motions filed after Surrebuttal testimony is filed without holding the conference required by 4 CSR 240-2.090(8)(B).

e. Workpapers prepared in the course of developing a witness' testimony (including schedules) and exhibits shall not be filed with the Commission, but shall be submitted to each party within 2 business days following the filing of the particular testimony, unless a party has indicated that it does not want to receive some or all of the workpapers. Workpapers containing confidential information shall be appropriately marked. Counsel shall undertake to advise other counsel if the sponsored witness has no workpapers related to the round of testimony.

f. 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 with formulas intact. Workpapers shall be

provided in electronic format by e-mailing or by delivery of a compact disc or other electronic storage media.

g. Documents filed in EFIS shall be considered properly served by serving the same on counsel of record for all other parties via e-mail.

WHEREFORE, the Parties respectfully files this *Proposed Procedural Schedule* in compliance with the Commission's request at the July 23, 2019 procedural and technical conference.

Respectfully submitted,

/s/ Roger W. Steiner

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/s/ Nicole Mers

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**ATTORNEY FOR STAFF OF THE MISSOURI
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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 25th day of July 2019.

/s/ Roger W. Steiner

Roger W. Steiner