# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of KCP&L Greater Missouri Operations Company for Permission and Of Public Convenience and Necessity Authorizing it to Approval of a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage Solar Generation Facilities in Western Missouri

File no. EA-2015-0256

#### MOTION TO SUSPEND RECOMMENDATION SCHEDULE

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion to Suspend Schedule* states:

1. On November 12, 2015, KCP&L Greater Missouri Operations Company ("GMO" or "Company") filed its Application for a Certificate of Public Convenience and Necessity ("CCN") authorizing it to construct, install, own, operate, maintain and otherwise control and manage electrical solar production and related facilities near Greenwood, Missouri.

2. On November 24, 2015, the Commission ordered Staff to file its recommendation no later than January 21, 2016. It also set a January 21, 2016 deadline for recommendations from other parties.

3. On December 28, 2015, the Office of the Public Counsel filed a motion for a procedural conference for the purpose of developing a proposed procedural schedule.

4. On January 6, 2016, the Commission entered its *Order Scheduling a Procedural Conference*, in which it scheduled a procedural conference for January 14, 2016. The procedural conference will provide the parties an opportunity to discuss procedural and substantive issues and will likely establish a procedural schedule.

5. If a hearing is scheduled, Staff would provide its recommendation in the first testimony it files. If a hearing is not scheduled, Staff would need additional time

following the procedural conference to develop its recommendation, given additional information it might gain from the procedural conference. Staff therefore recommends suspension of the recommendation requirement and deadline.

WHEREFORE, Staff recommends suspension of the recommendation requirement and deadline in this case.

Respectfully submitted,

### /s/ Marcella L. Mueth

Marcella L. Mueth Missouri Bar Number 66098 Assistant Staff Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102 573-751-4140 (Voice) 573-526-6969 (Fax) marcella.mueth@psc.mo.gov Attorney for Staff of the Missouri Public Service Commission

# **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 11<sup>th</sup> day of January, 2016.

### /s/ Marcella L. Mueth