



Missouri Public Service Commission

Area Code 314
751-3234

January 20, 1987

P.O. BOX 360
JEFFERSON CITY
MISSOURI 65102

Slattery
Commissioners:

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Staff Director

HARVEY G. HUBBS

Secretary

WILLIAM C. HARRELSON

General Counsel

Mr. Harvey G. Hubbs
Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Re: Case No. HO-86-139 - In the matter of the investigation of
steam service rendered by Kansas City Power & Light
Company.

Dear Mr. Hubbs:

Enclosed for filing in the above-captioned case is an
original and fourteen (14) conformed copies of a Motion for
Extension of Time. Copies have been sent this date to all
parties of record.

Thank you for your cooperation in this matter.

Sincerely yours,

Mary Ann Young

Mary Ann Young
Deputy General Counsel

MAY:nsh
Enclosures
cc: All parties of record

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PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the investigation)
of steam service rendered by) Case No. HO-86-139
Kansas City Power & Light Company.)

MOTION FOR EXTENSION OF TIME

Comes now the Staff of the Missouri Public Service Commission (Staff) and for its Motion for Extension of Time states as follows:

1. This case involves the proposed plan of Kansas City Power & Light Company to discontinue central steam service in the downtown Kansas City area, and to raise rates by approximately 120% on a one-time basis or 22% percent per year on a four-year phase-in plan. The Application poses many difficult and interrelated questions which renders the proceeding more complex than a typical rate case. Staff's prepared testimony is currently due on February 2, 1987.

2. The Staff has retained an outside consultant to assist in addressing the Company's plan as it relates to the current condition of the steam system and actions taken by the Company during the period it has operated the system. The results of the work of the outside consultant will be utilized by the Commission Staff in making ultimate recommendations to the Commission as to whether the KCP&L plan should be approved as filed, rejected, or approved in some alternate form. In addition, the question of rates must be addressed, but in a different manner than in a typical case of setting rates for an ongoing business. In addition, there are the specific questions that were enumerated by the Commission in the Report and Order of KCP&L's recent electric rate case involving the Wolf Creek Generating Station which will be addressed. (Case Nos. ER-85-128 and EO-85-185, Report and Order, p. 235). Because of the complexity of this case, more discovery was required than on a typical steam rate case.

3. Although the audit of the books of the Company and the field investigation of the steam generation and distribution plant by

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the consultant and the Staff have proceeded in a relatively timely manner, the coordination of the various pieces of the puzzle which this case presents will require significant effort after the field investigation work is concluded.

4. The Staff believes this case deserves thorough consideration and analysis. Under the current schedule, Staff will not be able to make well thought out and reasoned recommendations to the Commission in this very difficult case.

5. For the reasons stated above, the Staff requests an extension of time to file its direct testimony from February 2, 1987 to February 23, 1987. We recognize that this is a fairly lengthy delay which, unfortunately, will require rescheduling of the other proceedings in this docket. However, this request for extension is not intended to unduly delay these proceedings or resolution of the Company's application, but is necessary for the Staff to complete a thorough investigation and evaluation of the Company's proposals and to provide recommendations as to the appropriate resolution thereof to the Commission.

6. This extension of time should not prejudice the Company nor cause difficulties for the customers or intervenors in this case. The Company's tariffs have been suspended only once, to May 1, 1987, and could be extended for an additional six months to November 1, 1987. Staff has no desire to see the case proceed for the entire eleven month statutory period; however, Staff does believe that even with the extension requested, the Commission will be able to issue its Report and Order well before the 1987 heating season. This should give the customers an opportunity to pursue alternatives to steam heat, in the event the discontinuance of central steam service is permitted, and/or to permit KCPL to get new rates in place prior to the beginning of the heating season.

7. In conjunction with this request for extension of time, Staff would recommend the following changes to the remainder of the procedural schedule in this case:

<u>Event</u>	<u>Current Date</u>	<u>Recommended Date</u>
Prehearing Conference	February 23	March 16
Hearing Memorandum due	February 27	March 20
Hearing Dates	March 9 - March 13	March 30 - April 10


8. It will be noted that the proposed schedule provides for two weeks of hearing time rather than the current one week of hearing time scheduled. In the Staff's opinion, with the number of parties and number and complexity of issues in this case, it will probably be impossible to complete hearings within one week. If, as a result of the prehearing conference, it appears unnecessary to utilize the full two weeks of hearing, the parties can notify the Commission of that fact. However, Staff would request that the Commission set aside two weeks of hearing time when it orders any changes in the existing schedule.

9. Under the Commission's Rules of Practice and Procedure, the other parties to this case would normally be allowed ten days from the date of filing of this document to respond to this motion. Although the Staff has filed this motion as quickly as it was aware of the need for this extension, the ten day period would run until Friday, January 30, which is the last business day before the Staff's current February 2, 1987 filing date. Therefore, Staff suggests that this may be an appropriate instance for the Commission to determine that circumstances will not permit the full ten day response period pursuant to 4 CSR 240-2.080(9), and order the parties to respond by Wednesday, January 28, 1987, or such other date as the Commission selects. To facilitate early responses, this motion is being sent to all parties of record by Express Mail for delivery on Wednesday, January 21.

WHEREFORE, for all the reasons hereinabove stated, Staff requests that the Commission extend the deadline for filing of Staff's

testimony from February 2, 1987 to February 23, 1987, and to make other changes in the procedural schedule as outlined above.

Respectfully submitted,


Mary Ann Young
Deputy General Counsel

Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102
(314)751-7499

CERTIFICATE OF SERVICE

I hereby certify that
copies of the foregoing
have been mailed or hand-
delivered to all parties of
record on this 20th day of

January 19 87
