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 the Company's) Approved Fuel and Purchased Power Cost) Recovery Mechanism)

File No. ER-2017-0357

PUBLIC COUNSEL DATA REQUEST #8000 TO KCP&L GREATER MISSOURI OPERATIONS COMPANY

The Office of Public Counsel (Public Counsel) hereby provides the following Data Request to KCP&L Greater Missouri Operations Company (GMO or Company) pursuant to the Commission's Rule 4 CSR 240-2.090. Public Counsel is requesting Empire to respond to these requests within twenty (20) days of receipt. Please provide electronic responses to the following: opcservice@ded.mo.gov.

DEFINITIONS

As used herein, the words "document" or "documents" include any original and all copies of any written, printed, typed, electronically stored, or graphic matter of any kind or nature, however produced or reproduced, now in your possession, custody or control, or in the possession, custody or control of your agents, representatives, employees of you or any and all persons acting in your behalf, including documents at any time in the possession, custody or control of such individuals or entities, or known by you to exist.

DATA REQUEST

8000. Please provide a detailed explanation as to why GMO, in ER-2017-0357, determined that it was not able to provide a response to its FAC rate change filing in accord with 4 CSR 240-3.161(7)1.G, i.e., what changed between the last GMO FAC rate change case, ER-2017-0188 and this case that resulted in GMO no longer being able to provide a response?

Submitted by Lena Mantle on 7/10/2017

Attachment A