

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

In the Matter of Kansas City Power & Light	)	
Company's Request for Authority to Implement	)	<b><u>Case No. ER-2016-0285</u></b>
A General Rate Increase for Electric Service	)	

**JOINT MOTION OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS, THE  
OFFICE OF THE PUBLIC COUNSEL, AND THE CONSUMERS COUNCIL OF  
MISSOURI TO CANCEL SOUTHWEST POWER POOL PRESENTATION AND  
REQUEST FOR EXPEDITED TREATMENT**

Come now the Missouri Industrial Energy Consumers, the Office of the Public Counsel, and the Consumers Council of Missouri ("Joint Movants") and file their Motion to Cancel Southwest Power Pool ("SPP") Presentation and Request for Expedited Treatment. In support thereof, Joint Movants state as follows:

1. Joint Movants collectively represent the interests of customers of Kansas City Power & Light Company ("KCPL"). As such, they have an interest in ensuring that this case is decided upon the evidence presented in this case and not upon extra-record material.
2. KCPL witnesses Darrin Ives and Tim Rush propose in their Direct Testimony filed on July 1, 2016, to modify the Company's FAC mechanism to include the recovery of forecasted transmission costs, specifically the transmission costs associated with the charges and revenues from SPP billings and transmission costs to buy and sell energy. As part of their testimony supporting that proposal, Mr. Ives and Mr. Rush discuss KCPL's participation in the SPP, the way that the SPP renders charges to KCPL, SPP's governance, the escalation and volatility of SPP costs, and related issues.
3. While the testimony of the Joint Movants and other parties will not be filed until December, it is reasonable to expect that KCPL's proposal will be contested. In fact, all of the Joint Movants independently intend to oppose that proposal.

4. By notice emailed to the PSC Docket Mailing List on Thursday, October 27, Joint Movants became aware that the Commission has scheduled a presentation by SPP on November 2. No details about the specific subject of the presentation were provided. However, it is entirely possible that the presentation will address the value of KCPL's participation in SPP, the level of cost to KCPL of such participation, or the volatility of the cost. These matters involve contested issues that the Commission will need to decide based upon the record evidence in this case.

5. There is no reason for presentation to the Commission of extra-record information relating to contested issues during the pendency of this rate increase case. Joint Movants request that the Commission cancel the presentation just noticed for November 2, and reschedule it for some time after this case has been decided. In the alternative, and without waiving any objection to the presentation, Joint Movants request that the presentation be recorded and all parties have an opportunity to provide responses in this case.

6. Pursuant to 4 CSR 240-2.080(14), Joint Movants request that the Commission rule upon this request before the scheduled date of the presentation: November 2. The harm that will occur if the Commission does not expeditiously cancel the presentation is that Joint Movant's right to fair hearing on the contested issues in this case, and to a decision on those issues based upon the record in this case, may be compromised. Joint Movants state that this motion has been filed as quickly as possible after notice of the presentation was emailed to the PSC Docket mailing list.

WHEREFORE, Joint Movants respectfully request that the Commission expeditiously cancel the SPP presentation scheduled for November 2, or in the alternative, record such presentation and allow the opportunity for all parties in this case to respond.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 31st day of October, 2016, to all parties on the Commission's service list in this case.

/s/ Diana Vuylsteke