

**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 ) **Case No. ER-2018-0145**  
A General Rate Increase for Electric Service )

In the Matter of KCP&L Greater Missouri )  
Operations Company's Request for Authorization to ) **Case No. ER-2018-0146**  
Implement A General Rate Increase for Electric )  
Service )

**MOTION TO CONSOLIDATE CASES AND  
PROPOSED PROCEDURAL SCHEDULE**

**COMES NOW** the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), by and through counsel, and states that on January 30, 2018, Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO") filed separate requests for authority to implement general rate increases for electric service. On behalf of the following parties to this case: KCP&L, GMO, the Office of the Public Counsel ("Public Counsel"), Missouri Division of Energy ("DE"), Missouri Energy Consumers Group ("MECG"), Missouri Industrial Energy Consumers ("MIEC"), Renew Missouri Advocates d/b/a Renew Missouri ("Renew"), and Dogwood Energy, LLC ("Dogwood") (collectively, "Parties"), Staff respectfully files the following Motion to Consolidate Cases and Proposed Procedural Schedule.

**Motion to Consolidate Cases**

1. KCP&L and GMO have filed with the Commission tariff sheets and direct testimony seeking general rate increases for both the KCP&L and GMO service areas. Two case numbers have resulted from these filings (ER-2018-0145 and ER-2018-0146).
2. Both KCP&L and GMO are owned and operated by the same entity (Great Plains Energy Incorporated). KCP&L personnel provide services to GMO. Both

companies have common offices and overheads. Both companies have ownership interests in Iatan. The test year and true up period will be the same for both companies.

3. Accordingly, there are common questions of law and fact in the above-referenced cases and the consolidation of Cases Nos. ER-2018-0145 and ER-2018-0146 would be administratively expedient in that it would simplify the filings to be made by all parties to these matters.

4. Commission Rule 4 CSR 240-2.110(3) allows the Commission to consolidate pending actions involving related questions of law or fact.

**WHEREFORE**, Staff and the Parties request a Commission order consolidating Cases Nos. ER-2018-0145 and ER-2018-0146 with Case No. ER-2018-0145 being the lead case.

### **Proposed Procedural Schedule**

1. The Parties request that the Commission adopt the following procedural Schedule:

<b><u>Event</u></b>	<b><u>Date</u></b>
Filing Date	January 30, 2018
Staff / Intervenor Direct Testimony	June 19, 2018
Staff / Intervenor Direct Testimony – Rate Design	July 6, 2018
Local Public Hearings	After July 6, 2018, Before August 15, 2018
First Technical Conference	July 17, 2018
True-Up Documentation Provided by KCP&L and GMO	July 20, 2018
Rebuttal Testimony <sup>1</sup>	July 27, 2018
Rebuttal Testimony – Rate Design <sup>2</sup>	August 7, 2018

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<sup>1</sup> This testimony filing will include revenue requirement issues concerning Fuel Adjustment Clauses, Solar Subscription Pilot Riders, Renewable Energy Programs and Electric Vehicle Charging Stations.

Company to Provide True-Up Adjustments	August 17, 2018
Second Technical Conference	August 20, 2018
Surrebuttal / True-Up Direct Testimony	September 4, 2018
Settlement Conference	September 6, 2018
List of Issues, Etc.	September 11, 2018
Cut-off for Non-True-Up Discovery	September 11, 2018
Statements of Position	September 13, 2018
Cut-off for True-Up Discovery	September 12, 2018
True Up Rebuttal Testimony	September 14, 2018
Evidentiary Hearing	September 17–28, 2018
Initial Briefs	October 17, 2018
Reply / True Up Briefs	October 26, 2018
Effective Date of Rates	December 29, 2018

**Test Year, True-Up, and Update Period**

2. The Parties shall utilize a test year ending June 30, 2017, updated through December 31, 2017.
3. The true-up period shall end June 30, 2018.

**Discovery Procedures**

4. 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.

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<sup>2</sup> This testimony filing will include all tariff and other non-revenue requirement issues regarding Time of Use pilots, Fuel Adjustment Clauses, Solar Subscription Pilot Riders, Renewable Energy Programs and Electric Vehicle Charging Station Tariffs.

- 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. Until the filing of Rate Design Rebuttal testimony, the response time for all data requests shall be 20 calendar days, and 10 calendar days to object or notify that more than 20 calendar days will be needed to provide the requested information. After the filing of Rate Design Rebuttal testimony (August 7, 2018) and before the filing of Surrebuttal testimony (September 4, 2018), the response time for data requests shall be 10 calendar days to provide the requested information, and 5 business days to object or notify that more than 10 calendar days will be needed to provide the requested information. After the filing of Surrebuttal testimony (September 4, 2018), the response time for data requests shall be 5 business days to provide the requested information, and 2 business days to object or notify that more than 5 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.
- h. Data requests and responses thereto made by any party in Case Nos. EE-2018-0108, ER-2016-0156, and ER-2016-0285 shall be treated as having been made in these cases, ER-2018-0145 and ER-2018-0146, subject to objections as to relevance and admissibility in evidence.

**Local Public Hearings**

5. Subject to the Commission's schedule and the availability of the proposed locations, the Parties either support or do not object that the Commission hold local public hearings at each of the following locations after July 6, 2018, and before August 15, 2018:

<p>Martin Community Center Room #2 1985 S. Odell Avenue Marshall, MO 65340</p>	<p>Bruce R. Watkins Cultural Heritage Center Auditorium 3700 Blue Parkway Kansas City, MO 64130</p>
<p>Gregg/Klice Community Center Large Meeting Room 1600 East 17th Terrace Kansas City, MO 64108</p>	<p>Gladstone Community Center Gladstone/Linden Room 6901 N. Holmes Street Gladstone, MO 64118</p>
<p>Community Center Meeting Room 200 North Ash Nevada, MO 64772</p>	<p>Elks Lodge Banquet Room 115 West Franklin Clinton, MO 64735</p>

Liberty Park Convention Hall 1500 West 3rd Street Sedalia, MO 65301	City Hall Council Chambers 1100 Frederick Ave St. Joseph, MO 64501
Lee's Summit High School Lecture Hall 400 Southeast Blue Pkwy Lee's Summit MO 64086	Clay County Courthouse 3rd Floor Commission Hearing Room 1 Courthouse Square Liberty, MO 64068

6. The Parties request that the Commission issue a subsequent order setting the dates and times of local public hearings, after determining the availability of the referenced locations, and directing interested parties to file, by March 15, 2018, notice language to be mailed as bill inserts to KCPL's and GMO's customers.

**WHEREFORE**, on behalf of the Parties, Staff respectfully files this motion to consolidate cases and proposed procedural schedule in compliance with the Commission's February 8, 2018 order.

Respectfully submitted,

**/s/ Mark Johnson**

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Attorneys for the Staff of the  
Missouri Public Service Commission

**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 2nd day of March, 2018.

**/s/ Mark Johnson**