

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

In the Matter of KCP&L Greater Missouri)
Operations Company's Request for Authority)
To Implement a General Rate Increase for)
Electric Service)

Case No. ER-2016-0156

Tariff No. YE-2017-0068

Staff's Motion for an Extension of Time

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion for an Extension of Time*, states as follows:

1. On November 8, 2016, KCP&L Greater Missouri Operations Company ("GMO") filed its proposed tariffs intended to implement the Commission's decision of September 28, 2016, embodied in its *Order Approving Stipulations And Agreements, Rejecting Tariffs, Cancelling True-Up Hearing, And Ordering Filing Of Compliance Tariffs*, Tariff File YE-2017-0068. These proposed tariffs are referred to as "Compliance Tariffs."

2. Together with Tariff File YE-2017-0068, GMO filed its *Motion for Approval of Compliance Tariff Sheets*, requesting that the Commission approve the Compliance Tariffs for service rendered on and after December 22, 2016.

3. On November 9, 2016, the Commission issued its *Order Setting Time for Responses to Compliance Tariffs and Motion*, in which it directed that "Staff shall file its recommendation on the compliance tariffs and a response to *KCP&L Greater Missouri Operations Company's Motion for Approval of Compliance Tariff Sheets*," not later than 4:00 p.m. on November 16, 2016.

4. Staff states that it has diligently undertaken to review the more than 100 sheets and that, as of now, it has found numerous instances in which the proposed sheets do not accurately reflect the Commission's order. Staff has advised the

Company of each such instance and the Company is diligently working to correct those issues. Nonetheless, Staff doubts that all of the necessary corrections can be made, and that Staff can complete its further review, prior to 4:00 p.m. on November 16, 2016.

5. If Staff is required to file its recommendation prior to the correction of the aforesaid issues and its subsequent review, its recommendation will necessarily be that the Compliance Tariffs should be rejected.

WHEREFORE, Staff prays that the Commission will grant an extension of time, up to and including Monday, November 21, 2016, at Noon, for the filing of its recommendation regarding the Company's Compliance Tariffs.

Respectfully submitted,

/s/ Kevin A. Thompson

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served electronically, by hand-delivery, or by First Class United States Mail, postage prepaid, upon all of the parties and their counsel reflected on the Service List for this case maintained by the Commission's Data Center on this 15th day of November, 2016.

/s/ Kevin A. Thompson