

**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 A General)
Rate Increase for Electric Service)

Case No. ER-2016-0285

**MOTION FOR LEAVE TO FILE SUPPLEMENTAL
SURREBUTTAL AFFIDAVIT AND FOR EXPEDITED TREATMENT**

COMES NOW Staff of the Public Service Commission of Missouri ("Staff"), and asks the Commission for leave to file this supplemental surrebuttal affidavit.

1. Kansas City Power and Light Company's ("KCPL") witness Burton Crawford filed true-up rebuttal testimony at 5:13 PM on Friday, March 10, 2017, raising an issue with Staff's market prices.
2. The *Order Adopting Procedural Schedule and Delegating Authority*, filed August 10, 2016, does not provide parties an opportunity for true-up surrebuttal testimony to respond to allegations raised in true-up rebuttal.
3. Staff witness Ms. Erin Maloney takes issue with the assertion made by KCPL in its true-up rebuttal, and this is her first opportunity to provide a response.
4. Staff will make Ms. Maloney available to testify at the true up hearing.

WHEREFORE, in order to give the Commission a fair and accurate record to make a decision upon, Staff prays the Commission accept Ms. Maloney's sworn affidavit, and permit her to take the stand to testify in support of her analysis at the true up hearing on March 16, 2017 and grant such an order no later than the start of hearing on March 16, 2017.

Respectfully submitted,

/s/ Nicole Mers

Nicole Mers

Assistant Staff Counsel

Missouri Bar No. 66766

Attorney for the Staff of the

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65012

(573) 751-6651 (Telephone)

(573) 751-9285 (Fax)

Nicole.mers@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 15th day of March 2017, to all counsel of record.

/s/ Nicole Mers

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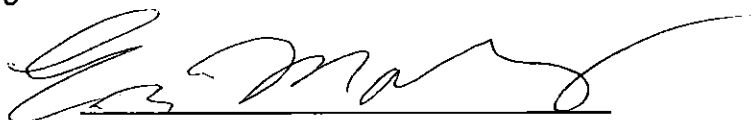
Case No. ER-2016-0285

AFFIDAVIT

State of Missouri)
) ss.
County of Cole)

COMES NOW Erin Maloney and on her oath declares that she is a licensed Professional Engineer in the State of Missouri; that she is employed as a technical expert on the Staff of the Missouri Public Service Commission; that she previously filed Direct Testimony in this matter reflecting her analysis of market power prices; that she later performed a true-up analysis of market power prices and that her professional opinion is that no true-up adjustment to her previous testimony was necessary; that her opinion is contrary to the testimony filed herein by KCPL last Friday; that this is her first and earliest opportunity to rebut the same; and that the contents of this Affidavit are true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

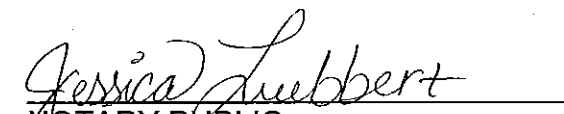


Erin Maloney

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 15th day of March, 2017.

JESSICA LUEBBERT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: February 19, 2019 Commission Number: 15633434



NOTARY PUBLIC