

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

In the Matter of KCP&L Greater Missouri)	
Operations Company Request for Authority)	<u>File No. ER-2019-0198</u>
to Implement Rate Adjustments Required by)	Tracking No. JE-2019-0136
4 CSR 240-20.090(4) and the Company's)	
Approved Fuel and Purchased Power Cost)	
Recovery Mechanism)	

STAFF MOTION FOR EXTENSION OF TIME

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

1. On December 31, 2018, KCP&L Greater Missouri Operations Company (GMO) submitted direct testimony and a tariff revision seeking to implement an adjustment to its Fuel and Purchased Power Adjustment Clause (FAC).

2. On January 2, 2019, the Commission ordered Staff to file a recommendation regarding its examination and analysis of GMO's application no later than January 30, 2019.

3. On January 23, 2019, GMO filed a substitute tariff (Substitute Tariff).

4. Staff diligently reviewed the revised tariff and Substitute Tariff. Staff and GMO have been working to resolve potential disputes regarding the revised tariff sheet and Substitute Tariff.

5. Staff anticipates that GMO may file another substitute tariff (Second Substitute Tariff) today on January 30, 2019.

6. In order to provide the Commission with a thorough review of the Second Substitute Tariff, and due to the need to review the not-yet-filed Second Substitute Tariff, Staff requests additional time in which to complete and file its recommendation.

Additionally, Staff has determined that the tariff revisions, to include an anticipated Second Substitute Tariff, may involve items of interest to the Commission¹ and requests the Commission provide additional time for the parties to discuss areas of interest regarding the tariff sheets' contents in a manner that may allow certain questions or concerns to be resolved through substitution of the tariff sheets.

7. Staff also suggests that the tariff sheet effective date of March 1, 2019, can still be met, even with this additional time, as Section 393.140(11) RSMo. allows the Commission to approve changes without 30 days' notice, for good cause, and would note that the Commission can delegate its authority to expedite the approval process, if the Commission would find this to be in the best interest of all the stakeholders.

8. Based on the foregoing, Staff requests an extension of time in which to file its Recommendation, or a request for a procedural conference, until February 8, 2019.

9. Staff Counsel has advised counsel for GMO of this request for an extension until February 8, 2019, to file Staff's Recommendation and has received indication that GMO is not opposed.

10. If Staff is required to file its recommendation prior to having an opportunity to thoroughly review the anticipated Second Substitute Tariff, or any subsequent substitute sheets that may be needed upon further discussion with GMO, its recommendation will necessarily be that the Commission should reject the tariff.

WHEREFORE, Staff submits its *Motion* for the Commission's consideration and respectfully requests an extension of time until February 8, 2019.

¹ These potential items of interest relate to certain portions of the sheet seeking to effectuate or utilize newly enacted Sections 393.1400 and 393.1655.

Respectfully Submitted,

/s/ Alexandra L. Klaus

Alexandra L. Klaus
Senior Counsel
Missouri Bar No. 67196
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-751-1854 (Voice)
573-751-9285 (Fax)
lexi.klaus@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 30th day of January, 2019, to all counsel of record.

/s/ Alexandra L. Klaus