

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

Staff of the Missouri Public Service Commission,)	
)	
)	
Complainant,)	
)	
vs.)	<u>File No. EC-2015-0309</u>
)	
Kansas City Power & Light Company)	
)	
and)	
)	
KCP&L Greater Missouri Operations Company)	
)	
)	
Respondents.)	

PROPOSED PROCEDURAL SCHEDULE

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, Kansas City Power & Light Company (KCP&L”), KCP&L Greater Missouri Operations Company (“GMO”), and the Office of the Public Counsel (“Public Counsel”), the Parties to this docket, and hereby this Proposed Procedural Schedule, and state as follows:

1. During the Prehearing Conference held by the Commission on July 15, 2015, the Regulatory Law Judge presiding over this case directed the parties to file a proposed procedural schedule by July 22, 2015. The Parties to this pleading have proposed the following dates in the procedural schedule, which is reflected herein. Those parties request that the Commission adopt the procedural schedule set forth in paragraph 2 below, and also adopt the related procedural items that have been agreed upon, as reflected in paragraph 3 below.

2 The Procedural Schedule proposed by the parties to this pleading is as follows:

Procedural Schedule

Direct Testimony Deadline	August 21, 2015 (Fri.)
Rebuttal Testimony Deadline	November 19, 2015 (Thur.)
After filing of Rebuttal, Response Time for Data Requests Reduced to 10 Calendar Days to Respond and 5 Business Days to Object/Notify of Need For Additional Time to Respond	
Surrebuttal/Cross Surr. Testimony Deadline	December 18, 2015 (Fri.)
After filing of Surrebuttal/Cross-Surr., Response Time for Data Requests Reduced to 5 Calendar Days to Respond and 3 Business Days to Object/Notify For Additional Time to Respond	
Last Day to Request Discovery	December 30, 2015 (Wed.)
Deadline to File List of Issues, List of Witnesses, Order of Cross-Examination, and Order of Opening Statements	January 8, 2016 (Fri.)
Deadline to File Statements of Position	January 12, 2015 (Tue.)
Evidentiary Hearings	January 19-21, 2016 (Tue. - Thurs.)
Deadline to File Initial Briefs	February 11, 2016 (Thurs.)
Deadline to File Reply Briefs	February 25, 2016 (Thurs.)

3. The Parties request that the Commission adopt the following procedures regarding discovery:

- a) All parties shall provide copies of testimony (including schedules),¹ 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.

¹ The source/support for a witness' testimony/report should be identified in the witness' testimony/report by citation or inclusion of the source/support. Examples of source/support for a witness' testimony/report are a document, a workpaper, or the response to a data request.

Parties are not required to put information that does not exist in electronic format into electronic format for purposes of exchanging it.

- b) Parties shall try to not include highly confidential or proprietary information in data request questions. If either highly confidential or proprietary information must be included in data request questions, the highly confidential or proprietary 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 highly confidential or proprietary 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, objections to data requests, and notifications respecting the need for additional time to respond to 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. 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 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 Rebuttal testimony and before the filing of Surrebuttal testimony, 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, 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 highly confidential or proprietary 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) If a data request has been responded to, a party's request for a copy of the response shall be timely responded to, considering that the underlying data request has already been responded to (except that, with the exception of responses to Staff, responses will not be needed for KCP&L's data request responses posted on CaseWorksEX).
- h) Documents filed in EFIS shall be considered properly served by serving the same on counsel of record for all other parties via e-mail.
- i) Data requests submitted to KCP&L regarding the Allconnect Direct Transfer Service Agreement, and data request answers provided in response to these Staff data requests in File No. EW-2013-0011 or EO-2014-0306 may be used in EC-2015-0309 and are subject to 4 CSR240-2.090(2)(F).

WHEREFORE, the above-named Parties file the Proposed Procedural Schedule set forth in paragraph 2 above, and request that the Commission adopt the same and include in its order its adoption of the procedural items requested by the Parties in paragraph 3 above.

Respectfully submitted,

/s/ Robert J. Hack

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing has been e-mailed, this 27th day of July, 2015, to counsel for all parties of record.

/s/ Kevin A. Thompson

