

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

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| The Staff of the Missouri Public Service Commission, | ) |  |
|  | ) |  |
|  | ) |  |
| Complainant,   | ) |  |
|  | ) |  |
| vs.  | ) |  |
|  | ) |  |
| KCP&L Greater Missouri Operations Company,           | ) |  |
|  | ) |  |
|  | ) |  |
| Respondent.  | ) |  |

**Case No. EC-2016-0012**

**MOTION TO EXCUSE PROPOSED  
PROCEDURAL SCHEDULE**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and for its *Motion to Excuse Proposed Procedural Schedule* states as follows:

1. The Commission on February 3, 2016, directed the parties to this proceeding to file a proposed procedural schedule no later than February 19, 2016. On February 5, 2016, Staff filed its *Motion for Summary Determination* and the Commission ordered all responses to Staff's *Motion* be filed no later than March 7, 2016. On February 17, 2016, Kansas City Power & Light Greater Missouri Operations ("GMO") filed its *Motion to Hold in Abeyance* ("Motion"), requesting the Commission to hold this matter in abeyance pending the outcome of judicial review of the Commission's Order in Case No. EC-2015-0315. Staff has no objection to GMO's *Motion* and notes that the issues to be decided in this case are similar to the issues decided by the Commission in Case No. EC-2015-0315.

2. Staff requests that in light of the pending response period to its *Motion for Summary Determination* that parties be excused from the requirement to file a proposed procedural schedule at this time. In the alternative, Staff requests that the requirement to file a proposed procedural schedule be considered in conjunction with GMO's *Motion to Hold in Abeyance*, and should the Commission grant GMO's *Motion*, the requirement to file a proposed procedural schedule also be held in abeyance pending resolution of judicial review in EC-2015-0315.

**WHEREFORE**, Staff prays that the Commission will excuse the requirement to file a proposed procedural schedule by February 19, 2016; and grant such other and further relief as the Commission deems just.

Respectfully submitted,

**/s/ Whitney Payne**

Whitney Payne

Legal Counsel

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### **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 18th day of February, 2016, to all counsel of record.

**/s/Whitney Payne**