

The Office of the Public Counsel and
The Midwest Energy Consumers Group,

Complainants,

v.

KCP&L Greater Missouri Operations Company

Respondent.

v.)
KCP&L Greater Missouri Operations Company)
Respondent.)

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Request for Ruling*, states herein as follows:

1. On September 10, 2019, the Midwest Energy Consumers Group (“MECG”) filed its *Reply Brief* in this matter.
2. Included in that *Rely Brief*, at pages 16-19, was a section entitled, “Staff Lacks Objectivity in Recent KCPL and GMO Cases.
3. On September 12 2019, because that section consists entirely of improper innuendo, *ad hominem* attacks on Staff’s integrity, and mis-statements of fact, all designed and intended to improperly influence the Commission, Staff filed its *Motion to Strike* that section.
4. Commission Rule 20 CSR 4240-2.080(13) provides, “Parties shall be allowed ten (10) days from the date of filing in which to respond to any pleading unless otherwise ordered by the commission.”

5. The tenth day after September 12, 2019, was Sunday, September 22, 2019. Pursuant to Rule 20 CSR 4240-2.050(1), MCEG's last day to respond to Staff's *Motion to Strike* was thus Monday, September 23, 2019.

6. MCEG has not responded to Staff's *Motion to Strike*, and the time permitted for doing so has elapsed.

7. MCEG has not denied that the cited section of its *Reply Brief* is immaterial, impertinent, scandalous, intended for an improper purpose and subject to being stricken.

WHEREFORE, Staff now requests that the Commission grant its unopposed *Motion to Strike*, filed on September 12, 2019, and will strike pages 16 through 19 of MCEG's *Reply Brief* filed herein, and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Kevin A. Thompson

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served electronically or by First Class Mail, postage prepaid, upon all parties or their representatives pursuant to the Service List maintained by the Commission's Data Center, on this 27th day of September, 2019.

Kevin A. Thompson