

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

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for)
Approval of a Special Incremental Load)
Rate for a Steel Production Facility)
In Sedalia Missouri)

Case No. EO-2019-0244

MOTION TO QUASH PURPORTED OBJECTION

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and hereby moves the Commission to quash the purported *Objection to Non-Unanimous Stipulation and Agreement* filed today in this proceeding by Midwest Energy Consumers Group (“MECG”); in support of which *Motion*, Staff states:

1. This matter arose on July 12, 2019, when KCP&L Greater Missouri Operations Company filed its *Application* for authority to serve Nucor, a steel producer, pursuant to a special incremental load rate under its proposed SIL Tariff.

2. On September 19, 2019, GMO, Nucor, and the Commission Staff entered into a *Non-Unanimous Stipulation and Agreement* resolving this matter.

3. Pursuant to Commission Rule 20 CSR 4240-2.115(2)(D), “A nonunanimous stipulation and agreement to which a timely objection has been filed shall be considered to be merely a position of the signatory parties to the stipulated position, except that no party shall be bound by it. All issues shall remain for determination after hearing.” Conversely, where there is no objection, the rule provides, “If no party timely objects to a nonunanimous stipulation and agreement, the commission may treat the nonunanimous stipulation and agreement as a unanimous stipulation and agreement.”

4. On September 24, 2019, MEEG filed its purported the same *Objection to Non-Unanimous Stipulation and Agreement*.

5. Concurrently with this *Motion*, Staff filed its *Motion to Dismiss Purported Party*, arguing that MEEG does not actually qualify for intervention in this matter and should therefore be dismissed. Based on the contents of that *Motion*, which are hereby incorporated herein by reference, Staff asserts that MEEG's *Objection* is incompetent and should be quashed and held for naught.

WHEREFORE, Staff prays that the Commission will quash and hold for naught the purported *Objection to Non-Unanimous Stipulation and Agreement* filed today; and grant such other and further relief as is just in the premises.

Respectfully submitted.

/s/ Kevin A. Thompson

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was served electronically upon all parties of record or their representatives pursuant to the Service List maintained for this case by the Commission's Data Center on this 24th day of September, 2019.

/s/ Kevin A. Thompson