

**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 June-November 2007 Accumulation)	
Period True-up Amounts of the Commission-)	<u>Case No. EO-2009-0431</u>
Approved Fuel Adjustment Clause of KCP&L)	
Greater Missouri Operations Company.)	

In the Matter of KCP&L Greater Missouri)	
Operations Company for Authority to Implement)	
Rate Adjustments Required by 4 CSR240-)	
20.090(4) and the Company's Approved Fuel and)	<u>Case No EO-2010-0002</u>
Purchased Power Cost Recovery Mechanism.)	

MOTION TO CONSOLIDATE

Comes now the Staff of the Missouri Public Service Commission, by counsel, and for its motion to consolidate, states:

1. At issue in above-captioned Case No. EO-2009-0431 are Staff adjustments to KCP&L Greater Missouri Operations Company's (GMO) fuel adjustment clause (FAC) true-up proposal that it has ***under-recovered*** during its FAC recovery period of March 2007 through February 2008 by \$1,136,160 from its customers in its MPS area and by \$188,893 from its customers in its L&P area. In Staff's Recommendation filed in Case No. EO-2009-0431 on June 25, 2009, the Staff asserts, instead, GMO has ***over-recovered*** during that recovery period by \$2,963,976 from its customers in its MPS area and by \$1,015,531 from its customers in its L&P area. The Staff adjustments from GMO's proposal to Staff's recommendation are shown in the table following:

Accumulation Period: June 1, 2007 through November 30, 2007
Recovery Period: March 1, 2008 through February 28, 2009

	GMO Proposed	Staff Adjustment	Staff Recommendation
MPS True-up Amount	\$1,136,160	(\$4,100,136)	(\$2,963,976)
L&P True-up Amount	\$188,893	(\$1,204,424)	(\$1,015,531)

2. In above-captioned Case No. EO-2010-0002 GMO filed tariff sheets that, as well as being designed to recover other amounts, are designed to implement recovery of the amounts GMO asserts it under-recovered in its FAC true-up proposal made in Case No. EO-2009-0431. *See GMO witness Rush Direct Testimony prefiled in Case No. EO-2010-0002 at page 6, lines 11-16.*

3. Because of the commonality of the interest and Off-System Sales margin issues in Case No. EO-2010-0002 and EO-2009-0431, the Staff proposes the two cases be consolidated for purposes of those issues.

WHEREFORE, the Staff moves the Commission to issue an order that consolidates Case No. EO-2009-0431 with Case No. EO-2010-0002 for purposes of hearing the issues common between those cases.

Respectfully submitted,

/s/ Nathan Williams

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 15th day of July 2009.

/s/ Nathan Williams

Nathan Williams