

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

In the Matter of the Application of Kansas City Power & Light Company for Authority to Extend the Transfer of Functional Control of Certain Transmission Assets to the Southwest Power Pool, Inc.)
) **File No. EO-2012-0135**
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In the Matter of the Application of KCP&L Greater Missouri Operations Company for Authority to Extend the Transfer of Functional Control of Certain Transmission Assets to the Southwest Power Pool, Inc.)
) **File No. EO-2012-0136**
)
)

**STAFF MOTION FOR EXTENSION OF TIME
FOR THE FILING OF REBUTTAL TESTIMONY**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through Staff Counsel’s Office, and files the instant Staff Motion For Extension Of Time For The Filing Of Rebuttal Testimony, and two other procedural dates, as a result of the disruption in work caused by the unusual snowstorms on February 22 and 26, 2013. In support of this Staff Motion, the Staff states as follows:

1. The Staff was working towards, and fully intending to make the required filing on March 4, 2013, when the State experienced snowstorms February 22 and 26, 2013 of unusual nature that prevented various members of the Staff from being able to make their way into the office preventing them in performing work on the instant filing on part or all of these days. It became clear by Wednesday, February 27, 2013, that the Staff needed additional time for the filing of its rebuttal testimony.¹

2. On Wednesday, February 27, 2013, the Staff counsel talked with KCPL/GMO counsel about a three-day extension in the filing date of rebuttal testimony in

¹ By Order Extending Time To File Cost Of Service And Revenue Requirement Direct Testimony in File No. ER-2011-0028, on February 4, 2011, the Commission granted non-Ameren Missouri parties a four-day extension of time to file direct testimony on cost of service and revenue requirement issues due to the work disruption caused by a snowstorm.

File Nos. EO-2012-0135 and EO-2012-0136 from Monday, March 4, to Thursday, March 7, due to the snowstorms of February 22 and 26, 2013, which have affected the Staff in the preparation of its rebuttal testimony.

3. After talking with the Office of the Public Counsel, the Public Counsel has authorized the Staff to state that the Public Counsel joins in this request for an extension of time for the Public Counsel's witness' work on these cases has been similarly affected by the two snowstorms.

4. The Staff told KCPL/GMO that it believes that if the Staff were to obtain such an extension, then the Staff thinks that it would only be appropriate for KCPL/GMO/Transource Missouri to receive a similar three-day extension for the filing of surrebuttal testimony in File Nos. EA-2013-0098 and EO-2012-0367, if they desired an extension, because Kansas City was subjected to the same snowstorms on February 22 and 26, 2013, as were Jefferson City and Columbia. The Staff position is that these extensions should be granted to all parties in these cases.

5. In discussing an extension in File Nos. EO-2012-0135 and EO-2012-0136, KCPL/GMO has related that it would want to extend the Surrebuttal/Cross-Surrebuttal Filing date a comparable three days. The Surrebuttal/Cross-Surrebuttal Filing date is April 25, 2013, which is a Thursday. A three-day extension would end Sunday, April 28, 2013. The Staff is amenable to the extension running to Monday, April 29, 2013. The Staff has related that it would like to see the Last Day To Serve Discovery be extended one day, from Thursday, May 16, 2013 to Friday, May 17, 2013. KCPL/GMO has indicated that it has no objection.

6. Therefore, the Staff requests that the Commission change the procedural dates in File Nos. EO-2012-0135 and EO-2012-0136 as follows:

<u>Filing/Event</u>	<u>Present Ordered Date</u>	<u>Proposed Changes</u>
Rebuttal Testimony To KCP&L and GMO	3/04/13	3/07/13
Surrebuttal and Cross-Surr. To Rebuttal	4/25/13	4/29/13
Settlement Conference Call	5/13/13	
Last Day to Serve Discovery	5/16/13	5/17/13
List of Issues, Order of Issues / Witnesses, etc.	5/21/13	
Joint Stipulation of Facts	5/23/13	
Position Statements	5/28/13	
Evidentiary Hearing	6/5-7/13	
Transcript Expedited	6/12/13	
Post-Hearing Briefs	7/10/13	
Reply Briefs	7/31/13	
Proposed Findings of Facts and Conclusions of Law	8/02/13	

7. Counsel for Intervenors Southwest Power Pool, Inc. (“SPP”), The Empire District Electric Company (“Empire”), and Dogwood Energy, LLC (“Dogwood Energy”) have indicated that SPP, Empire, and Dogwood Energy have no objection to the requested extensions in procedural dates.

8. The Staff does not file this Motion requesting that the Commission extend the above indicated dates to unduly delay these proceedings, nor does the Staff lightly make this request.

WHEREFORE, the Staff files the instant Motion requesting that the Commission extend the time for the filing of Rebuttal Testimony from February 4, 2013 to February 7, 2013, the time for the filing of Surrebuttal/Cross-Surrebuttal Testimony from April 25, 2013 to April 29, 2013 and extend the Last Day To Serve Discovery from May 16, 2013 to May 17, 2013, for all parties,

as a result of the disruption in work caused by the unusual snowstorms on February 22 and 26, 2013.

Respectfully submitted,

/s/ Steven Dottheim
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing *Staff Motion For Extension Of Time For The Filing Of Rebuttal Testimony* have been transmitted electronically to all counsel of record this 28th day of February, 2013.

/s/ Steven Dottheim