

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

In the Matter of KCP&L Greater Missouri)
Operations Company's Application for)
Approval of Demand-Side Programs and for)
Authority to Establish a Demand-Side)
Programs Investment Mechanism.)

Case No. EO-2012-0009

STAFF'S MOTION TO SUSPEND TARIFF SHEETS

COMES NOW the Staff of the Missouri Public Service Commission and moves the Commission to suspend for at least 60 days beyond their stated effective date of April 20, 2012, as allowed by § 393.150, RSMo 2000, the operation of KCP&L Greater Missouri Operations Company's tariff sheets to implement its proposed demand-side programs and proposed demand-side programs investment mechanism that it filed with its application in this case on December 22, 2011. These tariff sheets bear an effective date of April 20, 2012, but the procedural schedule the Commission ordered on January 31, 2012, effective February 7, 2012, contemplates this case will not be fully submitted to the Commission for its determination before May 22, 2012—the date by which reply briefs are due. A 60 day suspension period conforms to the 180 days upon which the parties jointly proposed the procedural schedule that the Commission adopted (April 20 plus 60 days).

The specific tariff sheets are:

PSC MO. No. 1 Original Sheet No. R-62.21
PSC MO. No. 1 Original Sheet No. R-62.22
PSC MO. No. 1 Original Sheet No. R-62.23
PSC MO. No. 1 Original Sheet No. R-62.24
PSC MO. No. 1 Original Sheet No. R-62.25
PSC MO. No. 1 Original Sheet No. R-62.26
PSC MO. No. 1 Original Sheet No. R-62.27
PSC MO. No. 1 Original Sheet No. R-62.28

PSC MO. No. 1 Original Sheet No. R-62.29
 PSC MO. No. 1 Original Sheet No. R-62.30
 PSC MO. No. 1 Original Sheet No. R-62.31
 PSC MO. No. 1 Original Sheet No. R-62.32
 PSC MO. No. 1 Original Sheet No. R-62.33
 PSC MO. No. 1 Original Sheet No. R-62.34
 PSC MO. No. 1 Original Sheet No. R-62.35
 PSC MO. No. 1 Original Sheet No. R-62.36
 PSC MO. No. 1 Original Sheet No. R-62.37
 PSC MO. No. 1 Original Sheet No. R-62.38
 PSC MO. No. 1 Original Sheet No. R-62.39
 PSC MO. No. 1 Original Sheet No. R-62.40
 PSC MO. No. 1 Original Sheet No. R-62.41
 PSC MO. No. 1 Original Sheet No. R-62.42
 PSC MO. No. 1 Original Sheet No. R-62.43
 PSC MO. No. 1 Original Sheet No. R-62.44
 PSC MO. No. 1 Original Sheet No. R-62.45
 PSC MO. No. 1 Original Sheet No. R-62.46
 PSC MO. No. 1 Original Sheet No. R-62.47
 PSC MO. No. 1 Original Sheet No. R-62.48
 PSC MO. No. 1 Original Sheet No. R-62.49
 PSC MO. No. 1 Original Sheet No. R-64.06
 PSC MO. No. 1 Original Sheet No. R-64.07
 PSC MO. No. 1 Original Sheet No. R-64.08
 PSC MO. No. 1 Original Sheet No. R-64.09
 PSC MO. No. 1 Original Sheet No. R-64.10
 PSC MO. No. 1 Original Sheet No. R-68.1
 PSC MO. No. 1 Original Sheet No. 134
 PSC MO. No. 1 Original Sheet No. 135
 PSC MO. No. 1 Original Sheet No. 136
 PSC MO. No. 1 Original Sheet No. 137
 PSC MO. No. 1 Original Sheet No. 138
 PSC MO. No. 1 Original Sheet No. 139
 PSC MO. No. 1 Original Sheet No. 140
 PSC MO. No. 1 Original Sheet No. 141
 PSC MO. No. 1 Original Sheet No. 142
 PSC MO. No. 1 Original Sheet No. 143.

4th Revised Sheet No. R-62.01, canceling 3rd Revised Sheet No. R-62.01
 1st Revised Sheet No. R-62.01.1, canceling Original Sheet No. R-62.01.1
 1st Revised Sheet No. R-62.02, canceling Original Sheet No. R-62.02
 2nd Revised Sheet No. R-62.03, canceling 1st Revised Sheet No. R-62.03
 2nd Revised Sheet No. R-62.04, canceling 1st Revised Sheet No. R-62.04
 1st Revised Sheet No. R-62.05, canceling Original Sheet No. R-62.05
 1st Revised Sheet No. R-62.06, canceling Original Sheet No. R-62.06

1st Revised Sheet No. R-62.07, canceling Original Sheet No. R-62.07
 1st Revised Sheet No. R-62.08, canceling Original Sheet No. R-62.08
 1st Revised Sheet No. R-62.09, canceling Original Sheet No. R-62.09
 1st Revised Sheet No. R-62.10, canceling Original Sheet No. R-62.10
 1st Revised Sheet No. R-62.11, canceling Original Sheet No. R-62.11
 1st Revised Sheet No. R-62.12, canceling Original Sheet No. R-62.12
 1st Revised Sheet No. R-62.13, canceling Original Sheet No. R-62.13
 1st Revised Sheet No. R-62.14, canceling Original Sheet No. R-62.14
 2nd Revised Sheet No. R-64.01, canceling 1st Revised Sheet No. R-64.01
 2nd Revised Sheet No. R-64.02, canceling 1st Revised Sheet No. R-64.02
 2nd Revised Sheet No. R-64.03, canceling 1st Revised Sheet No. R-64.03
 2nd Revised Sheet No. R-64.04, canceling 1st Revised Sheet No. R-64.04
 2nd Revised Sheet No. R-64.05, canceling 1st Revised Sheet No. R-64.05
 4th Revised Sheet No. R-68, canceling 3rd Revised Sheet No. R-68
 5th Revised Sheet No. 18, canceling 4th Revised Sheet No. 18
 5th Revised Sheet No. 19, canceling 4th Revised Sheet No. 19
 5th Revised Sheet No. 21, canceling 4th Revised Sheet No. 21
 5th Revised Sheet No. 22, canceling 4th Revised Sheet No. 22
 5th Revised Sheet No. 23, canceling 4th Revised Sheet No. 23
 5th Revised Sheet No. 24, canceling 4th Revised Sheet No. 24
 5th Revised Sheet No. 25, canceling 4th Revised Sheet No. 25
 5th Revised Sheet No. 28, canceling 4th Revised Sheet No. 28
 3rd Revised Sheet No. 30, canceling 2nd Revised Sheet No. 30
 3rd Revised Sheet No. 33, canceling 2nd Revised Sheet No. 33
 2nd Revised Sheet No. 36, canceling 3rd Revised Sheet No. 36
 5th Revised Sheet No. 52, canceling 4th Revised Sheet No. 52
 3rd Revised Sheet No. 55, canceling 2nd Revised Sheet No. 55
 2nd Revised Sheet No. 58, canceling 3rd Revised Sheet No. 58
 5th Revised Sheet No. 61, canceling 4th Revised Sheet No. 61
 5th Revised Sheet No. 66, canceling 4th Revised Sheet No. 66
 2nd Revised Sheet No. 69, canceling 1st Revised Sheet No. 69
 5th Revised Sheet No. 71, canceling 4th Revised Sheet No. 71
 1st Revised Sheet No. 77, canceling Original Sheet No. 77
 2nd Revised Sheet No. 82, canceling 1st Revised Sheet No. 82
 1st Revised Sheet No. 128, canceling Original Sheet No. 128
 1st Revised Sheet No. 129, canceling Original Sheet No. 129
 1st Revised Sheet No. 130, canceling Original Sheet No. 130
 1st Revised Sheet No. 131, canceling Original Sheet No. 131
 1st Revised Sheet No. 132, canceling Original Sheet No. 132

WHEREFORE, moves the Commission to suspend for 60 days beyond their proposed effective date, as allowed by § 393.150, RSMo 2000, the operation of KCP&L Greater Missouri Operations Company's tariff sheets to implement its proposed demand-side programs

and proposed demand-side programs investment mechanism that it filed with its application in this case on December 22, 2011.

Respectfully submitted,

/s/ Nathan Williams

Nathan Williams

Deputy Counsel

Missouri Bar No. 35512

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-8702 (Telephone)

(573) 751-9285 (Fax)

nathan.williams@psc.mo.gov (e-mail)

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 17th day of February, 2012.

/s/ Nathan Williams