

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

In the Matter of the Application of Transource Missouri, )  
L.L.C. for a Certificate of Convenience and Necessity )  
Authorizing it to Construct, Finance, Own, Operate, ) **File No. EA-2013-0098**  
and Maintain the Iatan-Nashua and Sibley-Nebraska )  
City Electric Transmission Projects )

In the Matter of the Application of Kansas City Power & )  
Light Company and KCP&L Greater Missouri Operations )  
Company for Approval to Transfer Certain Transmission ) **File No. EO-2012-0367**  
Property to Transource Missouri, L.L.C. and for other )  
Related Determinations )

**JOINT RESPONSE OF SIGNATORIES TO COMMISSION’S APRIL 29, 2013 ORDER  
TO FILE PROPOSED AMENDED PROCEDURAL SCHEDULE**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through the Staff Counsel’s Office, on behalf of the Signatories to the Stipulation and Agreement<sup>1</sup> (“Stipulation”) filed on April 12, 2013 in File Nos. EA-2013-0098 and EO-2012-0367, i.e., the Staff, the Office of the Public Counsel (“OPC”), and the Applicants Transource Missouri, LLC (“Transource Missouri”),<sup>2</sup> Kansas City Power & Light Company (“KCP&L”), and KCP&L Greater Missouri Operations Company (“GMO”),<sup>3</sup> and files this *Joint Response Of Signatories To Commission’s April 29, 2013 Order To File Proposed Amended Procedural Schedule*. The Signatories propose to file a joint response to the questions posed in the Commission’s April 29, 2013 *Order To File Proposed Amended Procedural Schedule* on May 30, 2013. The Signatories separately file today, May 6, 2013, a First Amendment to the Stipulation and Agreement (“First Amendment”).

---

<sup>1</sup> Because no objection was filed to the Stipulation within seven (7) days of its being filed, the Commission may now treat it as unanimous under 4 CSR 240-2.115(2)(B)-(C).

<sup>2</sup> Transource Missouri is the Applicant in File No. EA-2013-0098.

<sup>3</sup> KCP&L and GMO are the Applicants in File No. EO-2012-0367.

1. The joint response to the Commission's April 29, 2013 *Order To File Proposed Amended Procedural Schedule* that the Signatories propose to file on May 30, 2013 will include the following:

- a Proposed Order approving the Stipulation filed on April 12, 2013 and the First Amendment filed on May 6, 2013 ; and
- a Memorandum in Support of the Stipulation that will:
  - address the Appendix to the Commission's April 29, 2013 *Order To File Proposed Amended Procedural Schedule*;
  - show that the Applicants have met their burden of proof on the Applications, as conditioned by the Stipulation and First Amendment;
  - show that the Application in File No. EA-2013-0098, as conditioned by the Stipulation and First Amendment, operates in the public interest (Section 393.170 RSMo. 2000), and
  - show that the Application in File No. EO-2012-0367, as conditioned by the Stipulation and First Amendment, operates in a manner not detrimental to the public interest (Section 393.190.1 RSMo. 2000).

2. Other than the First Amendment, the Signatories propose to file these aforementioned documents all at the same time because of the inter-related nature of the documents, and the Signatories believe that filing certain documents at different times may only raise unnecessary questions. As the Commission is aware, a stipulation and agreement is a negotiated settlement. It can be both very detailed in its provisions and can contain terms, including the payment of monetary sums, that represent compromises related to one or more issues in the case in lieu of detailed explanation.

Furthermore, each Signatory may have its own views regarding why certain settlement terms are a reasonable resolution of an issue or issues in the case.

3. The Signatories believe that the questions in the Appendix to the Commission's April 29, 2013 *Order To File Proposed Amended Procedural Schedule* are quite comprehensive, and the Signatories plan to respond to them fully. If the Commission has additional questions, the Signatories will make every effort to answer those questions, either in writing, at a hearing, or both.

**WHEREFORE**, the Signatories propose to file a joint response to the Commission's April 29, 2013 *Order To File Proposed Amended Procedural Schedule* on May 30, 2013, and today, May 6, 2013, separately file a First Amendment to the Stipulation And Agreement in addition to the instant *Joint Response Of Signatories To Commission's April 29, 2013 Order To File Proposed Amended Procedural Schedule*.

Respectfully submitted,

**/s/ Steven Dottheim**

Steven Dottheim, MBN 29149  
Nathan Williams, MBN 35512  
Goldie Tompkins, MBN 58759  
Meghan E. Woolery, MBN 63070  
Missouri Public Service Commission  
P.O Box 360  
Jefferson City, MO 65102-0360  
(573) 751-7489  
(573) 751-9285 (Fax)  
[steve.dottheim@psc.mo.gov](mailto:steve.dottheim@psc.mo.gov)  
[nathan.williams@psc.mo.gov](mailto:nathan.williams@psc.mo.gov)  
[goldie.tompkins@psc.mo.gov](mailto:goldie.tompkins@psc.mo.gov)  
[meghan.woolery@psc.mo.gov](mailto:meghan.woolery@psc.mo.gov)

Attorneys for the Staff of the  
Missouri Public Service Commission

Karl Zobrist, MBN 28325  
Lisa A. Gilbreath, MBN 62271  
4520 Main Street, Suite 1100  
Kansas City, MO 64111  
(816) 460-2545  
(816) 531-7545 (Fax)  
[karl.zobrist@dentons.com](mailto:karl.zobrist@dentons.com)  
[lisa.gilbreath@dentons.com](mailto:lisa.gilbreath@dentons.com)

Attorneys for Kansas City Power & Light  
Company, KCP&L Greater Missouri Operations  
Company, and Transource Missouri, LLC

Roger W. Steiner, MBN 39586  
Corporate Counsel  
Kansas City Power & Light Company  
1200 Main Street  
Kansas City, MO 64105  
(816) 556-2314  
(816) 556-2787 (Fax)  
[roger.steiner@kcpl.com](mailto:roger.steiner@kcpl.com)

Attorney for Kansas City Power & Light  
Company and KCP&L Greater Missouri  
Operations Company

Larry W. Brewer  
Assistant General Counsel  
American Electric Power Company, Inc.  
400 West 15th Street, Suite 1500  
Austin, TX 78701  
(512) 481-3320  
(512) 391-2978 (Fax)  
[lwbrewer@aep.com](mailto:lwbrewer@aep.com)

Attorney for Transource Missouri, LLC

Lewis R. Mills, Jr., MBN 35275  
Public Counsel  
P.O. Box 2230  
Jefferson City, MO 65102-2230  
(573) 751-1304  
(573) 751-5562 (Fax)  
[lewis.mills@ded.mo.gov](mailto:lewis.mills@ded.mo.gov)

Office of the Public Counsel

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing *Joint Response Of Signatories To Commission's April 29, 2013 Order To File Proposed Amended Procedural Schedule* have been transmitted electronically to all counsel of record this 6<sup>th</sup> day of May, 2013.

**/s/ Steven Dottheim**