

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

In the Matter of Kansas City Power & Light)
Company's Request for Authority to)
Implement a General Rate Increase for)
Electric Service)

Case No. ER-2014-0370

STAFF'S OBJECTION TO KCPL'S RATE CASE EXPENSE UPDATE

COMES NOW the Staff of the Missouri Public Service Commission and, in response to the Commission's August 12, 2015, *Order Directing Filing Regarding Rate Case Expense Update*, objects to KCPL's argument advocating its positions made in its pleading titled *Kansas City Power & Light Company Rate Case Expense Update* filed at 10:33 a.m., August 12, 2015, during Commission deliberation of this case. KCPL's argument in paragraph three of its pleading is unrelated to the admissibility of its updated rate case expense. The Commission established on December 12, 2014, in its ordered procedural schedule, a briefing schedule which KCPL jointly proposed with Staff and several other parties, where the merits of parties' positions on the issues were to be argued—initial briefs due July 22, 2015, and reply and true-up briefs due August 3, 2015..

With regard to the highly confidential amounts shown in the highly confidential attachment to KCPL's August 12, 2015, pleading, KCPL did not file in EFIS until 4:32 p.m. on August 12, 2015, and Staff did not otherwise receive, the invoices KCPL states in its footnote 1 supports those amounts. Since then Staff has reviewed those invoices and, based on that review, if the Commission admits into evidence in this case the more detailed highly confidential accounting of KCPL's rate case expenses attached to this pleading (which includes KPCL's updated rate case expense

for Dr. Overcast that Staff is requesting the Commission to disallow and the amount of Staff's adjusted total true-up rate case expense), then Staff does not object to the Commission also admitting into evidence KPCL's highly confidential attachment to its August 12, 2015, rate case expense update filing.

WHEREFORE, as ordered, the Staff of the Missouri Public Service Commission objects to KCPL's pleading titled, *Kansas City Power & Light Company Rate Case Expense Update* as set forth above, and moves for the highly confidential attachment to this pleading—which shows KCPL's rate case expense updated through August 12, 2015—be admitted into evidence in this case.

Respectfully submitted,

/s/ Nathan Williams

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or by electronic mail to all counsel of record on this 14th day of August, 2015.

/s/ Nathan Williams