## 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 )

File No. ER-2014-0370

## STAFF'S RESPONSE TO KANSAS CITY POWER AND LIGHT COMPANY'S MOTION TO STRIKE PORTIONS OF PRE-FILED SURREBUTTAL TESTIMONY OF OPC WITNESS WILLIAM ADDO

**COMES NOW** the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), by and through counsel, and for its response to Kansas City Power & Light's ("KCPL" or "Company") motion to strike portions of testimony of the Office of Public Counsel ("OPC") witness William Addo respectfully states as follows:

- 1. On June 23, 2015, KCPL filed a motion to strike portions of Mr. Addo's testimony relating to the issue of "Rate Case Expense" (Issue XIV). KCPL argues that the testimony violates 4 CSR 240-2.130(10), which prohibits any party from supplementing pre-filed direct, rebuttal or surrebuttal testimony unless ordered by the presiding officer or the commission.
- 2. Staff Counsel has reviewed the OPC's response to KCPL's motion to strike portions of the testimony of OPC witness William Addo. Staff Counsel agrees with the reasoning contained in OPC's response and supports its request that the Commission issue an order denying KCPL's motion to strike portions of Addo's testimony.

WHEREFORE, Staff requests the Commission issue an order denying KCPL's Motion to Strike Portions of pre-filed surrebuttal testimony of William Addo.

Respectfully Submitted,

## /s/ Marcella L. Mueth

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## **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 25<sup>th</sup> day of June, 2015.

/s/ Marcella L. Mueth