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

In the Matter of the Staff Investigation of Allconnect	)
Direct Transfer Service Agreement Between	)
Allconnect, Inc. and Great Plains Energy Services	) File No. EO-2014-0306
Incorporated Respecting Itself and Its Affiliates	)
Kansas City Power & Light Company and KCP&L	)
Greater Missouri Operations Company	)

## SECOND STAFF PROGRESS REPORT

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through undersigned counsel of the Staff Counsel's Office, and files a Second Staff Progress Report. In support thereof, the Staff states as follows:

- 1. On July 31, 2014, the Staff filed with the Commission a Staff Progress Report in which it advised the Commission that was still in the process of conducting discovery, but that prior to filing its Staff Report with the Commission, it anticipated providing a draft of its Report to KCP&L/GMO and Allconnect, Inc. to receive any comments KCP&L/GMO and Allconnect, Inc. may have, particularly comments that might address the factual correctness of the draft. The Staff also stated that it anticipated filing its Report containing its findings and any recommendations the Staff might have on or about November 1, 2014.
- 2. Since the Staff's July 31, 2014 Progress Report, the Staff has continued to work diligently and deliberately on its investigation of the Allconnect Direct Transfer Service Agreement between Allconnect and GPES on behalf of itself and KCP&L/GMO involving among other things the transfer of KCP&L/GMO customer information to Allconnect, Inc. The Staff noted KCP&L/GMO continued to ask for additional weeks to respond to Staff's data requests and the Staff accommodated KCP&L/GMO.

- 3. In addition to the original set of 56 recorded calls between KCP&L/GMO customer representatives and KCP&L/GMO customers, which customer calls were transferred to Allconnect, Inc. representatives and these calls were recorded as part of the set and listened to by the Staff, since July 31, 2014, the Staff has listened to a set of 45 recorded calls from a more current time period between KCP&L/GMO customer representatives and KCP&L/GMO customers, which customer calls were transferred to Allconnect, Inc. representatives. These calls from a more current time period were listened to by the Staff in an attempt to determine whether there is any material difference between the calls from the two different time periods.
- 4. In the Staff's July 31, 2014 Progress Report, the Staff stated that it anticipated filing its Report containing its findings and any recommendations the Staff may have on or about November 1, 2014. Due to the press of other Commission cases, the Staff accommodating KCPL/GMO's requests for additional time to respond to the Staff's data requests, and the Staff seeking to be as deliberate as possible in these matters, the Staff is not able to meet the November 1, 2014 date that it previously stated to the Commission. The Staff will submit to the KCPL/GMO a draft of the Staff Report next week, the first week in November. Once KCPL/GMO indicates to Staff what, if anything, in the draft might need to be redacted, before the draft is sent to Allconnect, the Staff will send a copy to Allconnect. The Staff anticipates filing the Staff Report with the Commission by December 12, 2014.

**WHEREFORE** the Staff files its Second Staff Progress Report.

Respectfully submitted,

## /s/ Steven Dottheim

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing *Second Staff Progress Report* have been transmitted electronically to Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company and the Office of the Public Counsel this 31st day of October, 2014.

/s/ Steven Dottheim