

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

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for)
Approval of a Special Incremental Load)
Rate for a Steel Production Facility)
In Sedalia Missouri.)

Case No. EO-2019-0244

**MOTION FOR PRESIDING OFFICER TO ATTEND DEPOSITION
AND REQUEST FOR EXPEDITED TREATMENT**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion for Presiding Officer to Attend Deposition and Request for Expedited Treatment*, hereby states as follows:

1. This matter arose on July 12, 2019, when KCP&L Greater Missouri Operations Company filed its *Application* for authority to serve Nucor, a steel producer, pursuant to a special incremental load rate under its proposed SIL Tariff.
2. On the same day, the Commission issued its *Order Directing Notice, Establishing Time To Intervene, And Scheduling A Procedural Conference*.
3. On July 22, 2019, MEEG filed its *Application to Intervene*, stating that it “is an incorporated association representing the interests of large commercial and industrial users of electricity” and “[a]s a group of large commercial and industrial customers of KCPL-GMO, MEEG’s interest in this case is different than that of the general public.”
4. On September 19, 2019, GMO, Nucor, and the Commission Staff entered into a *Non-Unanimous Stipulation and Agreement* resolving this matter.

5. On September 24, 2019, Intervenor Midwest Energy Consumers Group (“MECG”), pursuant to Commission Rule 20 CSR 4240-2.115(2)(D), filed its *Objection to Non-Unanimous Stipulation and Agreement*.

6. On the same day, Staff filed its *Motion to Quash Purported Objection* and its *Motion to Dismiss Purported Party*.

7. On September 25, 2019, Staff filed its *Notice of Deposition*, requiring MECG to designate a corporate representative “prepared to testify on behalf of MECG concerning the identity of the large commercial and industrial electricity users whose interests MECG claims it is representing,” to be deposed on oral examination on October 2, 2019, at 200 Madison Street, Room 810, Jefferson City, Missouri, 65101, commencing at 9:00 A.M.

8. Staff anticipates that MECG’s attorney will object to any response identifying the identities of the large commercial and industrial electricity users whose interests it claims to be representing, although no known privilege or statute protects those identities from disclosure.

9. Staff suggests that the public interest would be served if the presiding officer, or assigned Regulatory Law Judge, would attend the noticed deposition for the purpose of ruling immediately on the expected objections.

10. Because the noticed deposition is set for October 2, 2019, in only five days’ time, Staff further requests that the Commission take up this motion on an expedited basis.

WHEREFORE, Staff prays that the presiding officer, or assigned Regulatory Law Judge, will attend the deposition of MECG's corporate representative noticed for 9:00 A.M. on October 2, 2019, for the purpose of ruling immediately on objections; and grant such other and further relief as is just in the premises.

Respectfully submitted.

/s/ Kevin A. Thompson

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was served electronically upon all parties of record or their representatives pursuant to the Service List maintained for this case by the Commission's Data Center on this 27th day of September, 2019.

/s/ Kevin A. Thompson