

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

In The Matter of KCP&L Greater Missouri)	
Operations Company's Residential Lighting and)	<u>File No. ET-2015-0076</u>
Appliance Program Tariff)	Tariff No. JE-2015-0125

MOTION FOR EXTENSION OF TIME TO FILE STAFF RESPONSE

COMES NOW the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and hereby submits this *Motion for Extension of Time to File Staff Response*. In support hereof, Staff states the following:

1. On August 22, 2014¹, KCP&L Greater Missouri Operations Company ("GMO") filed with the Commission a revised tariff sheet (Tariff Tracking No. JE-2015-0125), which proposed a change to the existing Residential Lighting and Appliance Program. That same day, GMO filed a *Motion for Expedited Treatment* requesting that the effective date of the tariff sheet be October 2 instead of October 22.

2. On August 23, the Commission issued its *Order Establishing Time To Respond To Motion For Expedited Approval Of Tariff* and ordered that any party wishing to respond to GMO's motion do so by September 29.

3. Staff respectfully requests until October 8 to file its response for the following reasons:

- a. In paragraph 1 of GMO's *Motion for Expedited Treatment*, the only justification provided for removal of two measures from GMO's MEEIA portfolio is: "These two measures didn't pass the Total Resource Cost screening in the 2013 Evaluation, Measurement and Verification Report prepared by Navigant Consulting, Inc." However, upon review,

¹ All dates herein refer to calendar year 2014 unless otherwise stated.

Staff did not find these TRC screenings in the Navigant EM&V Report, and when Staff asked GMO on September 26 where the TRC screenings for the two measures are located in the Navigant EM&V Report, GMO provided a delayed reply that they are not actually in the EM&V Report.

- b. Staff cannot find any recommendations in the Navigant EM&V Report concerning the discontinuance of the two measures.
- c. Staff requested and received GMO's TRC calculations for the two measures on Friday, September 26. However, Staff has additional questions and concerns regarding the TRC calculation work papers received, which will require additional time to review and analyze before Staff can provide an informed and accurate recommendation to the Commission.

4. GMO and the Office of the Public Counsel have been contacted regarding the extension and they stated that they do not object.

WHEREFORE, Staff files this *Motion for Extension of Time to File Staff Response* and respectfully requests that the Commission grant an extension of time to file its response until October 8, 2014, or until such times as the Commission deems sufficient.

Respectfully submitted,

/s/ Akayla J. Jones

Akayla J. Jones

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 29th day of September, 2014.

/s/ Akayla J. Jones