

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

In the Matter of Staff's Audit of Kansas City)
Power & Light Company's Expenditures)
Related to the LaCygne Air Quality Control)
System Project.)

Case No. **EO-2014-**_____

MOTION TO OPEN DOCKET

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and for its *Motion to Open Docket* states as follows:

1. Kansas City Power & Light Company ("KCPL") owns and operates the LaCygne Generation Station ("LaCygne").

2. KCPL has undertaken the installation of an Air Quality Control System ("AQCS") at LaCygne and related investment, including:

- a. Wet Flue Gas Desulfurization equipment (Unit 1),
- b. Baghouse (Unit 1),
- c. Wet Flue Gas Desulfurization (Unit 2),
- d. Baghouse (Unit 2),
- e. Selective Catalytic Reduction equipment (Unit 2),
- f. Low Nitrogen Oxide Burners (Unit 2),
- g. Over-fire Air System (Unit 2),
- h. Common Dual-Flue Chimney,
- i. Digital Control System.

3. Staff requests that the Commission open this docket to facilitate and retain discovery related to Staff's audit of the LaCygne AQCS and related investment.

4. Staff anticipates that any disputes related to the level of KCPL's prudent investment in the LaCygne AQCS would be made in the general rate case where KCPL seeks to include its LaCygne AQCS investment in rate base, and not in this docket.

WHEREFORE, Staff respectfully requests that the Commission open a docket to facilitate and retain discovery related to Staff's audit of KCPL's investment in the installation of an Air Quality Control System at the LaCygne Generation Station.

Respectfully submitted,

/s/ Sarah Kliethermes

Sarah L. Kliethermes
Construction & Depreciation Counsel
Missouri Bar No. 60024

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-6726 (Telephone)
(573) 751-9285 (Fax)
sarah.kliethermes@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 20th day of August, 2013.

/s/ Sarah Kliethermes