

**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)	

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 Staff Progress Report. In support thereof, the Staff states as follows:

1. On April 25, 2014, the Staff filed a motion for Commission authorization of a formal Staff investigation of the Allconnect Direct Transfer Service Agreement ("Transfer Service Agreement") dated April 30, 2013,¹ and activities of the parties related to the Transfer Service Agreement. The Staff further requested the opening of a File No. in the Commission's Electronic Filing and Information System ("EFIS") for the purpose of the investigation.

2. On April 30, 2014, the Commission issued an *Order Opening An Investigation Into The Agreements Between Allconnect, Inc. and Great Plains Energy Services, Regarding Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company* ("Order"). In said *Order*, the Commission directed that the Staff shall undertake an investigation of the transfer service agreement between Allconnect, Inc. ("Allconnect") and Great Plains Energy Services Incorporated ("GPES") on behalf of itself and its affiliates Kansas City Power & Light Company ("KCP&L") and KCP&L

¹ First Amendment To Transfer Service Agreement dated August 31, 2013.

Greater Missouri Operations Company (“GMO”). The Commission further ordered that the Staff should file a progress report regarding its investigation no later than July 31, 2014.

3. The Staff has been working diligently and deliberately on its investigation of the Allconnect Direct Transfer Service Agreement between Allconnect and GPES and the transfer of KCP&L/GMO customer information. Over the course of its investigation, the Staff has submitted over 100 Staff data requests in three separate files, File No. EW-2013-0011, File No. EO-2014-0306, and File No. EO-2014-0189 regarding Allconnect, Inc.² In addition, the Staff sent ten informal inquiries to KCP&L when it first learned of KCP&L’s/GMO’s plans to transfer customer calls to Allconnect, Inc. for third party sales purposes. In the discovery process, KCP&L/GMO a fair number of times has asked for additional time to respond to Staff’s data requests and the Staff has sought to accommodate KCP&L/GMO.

4. The Staff has also listened to 56 recorded calls between (a) KCP&L/GMO customer representatives and KCP&L/GMO customers, and then between (b) Allconnect, Inc. representatives and KCP&L/GMO customers. The Staff has pending with KCP&L/GMO a request for more current KCP&L/GMO and Allconnect, Inc. recordings so that the Staff can listen to more current calls before it submits its report to the Commission. Members of the Staff also recently, July 17, 2014, had a lengthy

² **File No EO-2014-0306:** In the Matter of the Staff Investigation of Allconnect Direct Transfer Service Agreement Between Allconnect, Inc. and Great Plains Energy Services Incorporated Respecting Itself and Its Affiliates Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company; **File No. EW-2013-0011:** In the Matter of a Working Docket to Address Effective Cybersecurity Practices for Protecting Essential Electric Utility Infrastructure; and **File No. EO-2014-0189:** In the Matter of Kansas City Power & Light Company’s And KCP&L Greater Missouri Operations Company’s Application for Approval of Cost Allocation Manual.

meeting in Kansas City with KCP&L executives and staff and a representative of Allconnect, Inc.

4. The Staff believes it is nearing the completion of the discovery process of its investigation. When its investigation is complete, it will prepare a report to file with the Commission and anticipates providing a draft of its report to KCP&L/GMO and Allconnect, Inc. prior to filing it with the Commission to receive any comments KCP&L/GMO and Allconnect, Inc. may have, particularly those that may address the factual correctness of the draft. The Staff anticipates filing its report containing its findings and any recommendations the Staff may have on or about November 1, 2014.

WHEREFORE the Staff submits its Progress Report.

Respectfully submitted,

/s/ Steven Dottheim

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing *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 July, 2014.

/s/ Steven Dottheim