

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light)
Company's Application for Approval of Demand-)
Side Programs and for Authority to Establish A) File No. EO-2014-0095
Demand-Side Programs Investment Mechanism)

MOTION TO PRESENT LIVE TESTIMONY

Come now the Natural Resources Defense Council, Earth Island Institute d/b/a Renew Missouri, and Sierra Club ("the Parties"), and hereby move the Presiding Officer, on delegation from the Commission, to exercise the authority under 2 CSR 240-2.130(9) & (10) to permit expert witness Phillip Mosenthal to present live direct testimony in support of a non-unanimous stipulation and agreement at the evidentiary hearing in this case scheduled for April 28 and 29, 2014.

The Parties, together with the Missouri Division of Energy, Kansas City Power & Light (KCP&L), and Kansas City Power & Light – Greater Missouri Operations (GMO) agreed to a Non-Unanimous Stipulation and Agreement Resolving KCP&L's MEEIA Filing (Agreement), filed April 17, 2014. This Agreement is the result of extensive negotiations, and embodies Parties' positions in full resolution of all remaining issues in this case. In order to adequately support these positions, Parties intend to present in testimony the analysis and conclusions of expert witness Phillip Mosenthal, as provided in 2 CSR 240-2.130(8). Because the final Agreement could not be reached prior to the deadlines for submitting Rebuttal or Surrebuttal Testimony in this case, and due to the compressed schedule of these proceedings, this testimony can most effectively be presented live by witness Mosenthal, rather than in the form of a pre-filed narrative report.

The Parties believe it is in the interest of the public and of the Commission to grant a reasonable opportunity to present this evidence. The non-unanimous stipulation and agreement is a potentially complete resolution of the case, and the Parties would like to have Mr. Mosenthal available to explain their reasons for entering into it.

For these reasons the Parties request that the Commission grant the Motion

/s/ Henry B. Robertson

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 21st day of April, 2014, to all counsel of record:

/s/ Henry B. Robertson
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