

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

In the Matter of the First Prudence Review of)
Costs Subject to the Commission-Approved)
Fuel Adjustment Clause of Kansas City Power)
and Light Company)

Case No. EO-2017-0231

**STAFF’S MOTION FOR EXTENSION OF TIME TO FILE ITS
FIRST FAC PRUDENCE REVIEW REPORT**

COMES NOW the Staff of the Missouri Public Service Commission (“Commission”), by and through counsel, and for its *Motion For Extension of Time to File Its First KCPL FAC Prudence Review Report* (hereafter “*Motion*”) respectfully states that it seeks a 60 day extension of time from August 28, 2017 to October 27, 2017 to file its first Kansas City Power and Light Company (“KCPL”) FAC (“Fuel Adjustment Clause”) prudence review report:

1. On March 8, 2017, the Staff filed notice in accordance with Commission Rule 4 CSR 240-20.090(7)(B) that it initiated its first prudence review of the costs and revenues associated with KCPL’s FAC for the period September 29, 2015 through September 29, 2015.

2. Rule 4 CSR 240-20.090(7)(B) set the following time line by which certain events are to take place:

**Time from start of Staff prudence
audit to event**

Event

Within 180 days – **August 28, 2017**

**Submission of Staff recommendation to
Commission regarding Staff’s
examination and analysis**

Within 190 days

Request for hearing

Within 210 days

Commission Order, if no hearing
requested

3. Staff seeks an extension of time to October 27, 2017 to file its report. Rule 4 CSR 240-20.090(7)(B)1.provides that the Commission may suspend the timeline for additional discovery to take place for good cause shown.

4. Staff states that good cause exists for granting its *Motion* for the following reasons:

- This is the first Staff prudence review of KCPL's FAC since the Commission approved KCPL's FAC in Case No. ER-2014-0370. KCPL implemented its FAC on September 29, 2015.
- Prudence review period is only 15 months (September 29, 2015 through December 31, 2016) and is well within the rule requirement that a prudence review be conducted no less frequently than at eighteen (18) month intervals.
- Discovery is still ongoing due to apparent accounting discrepancies which were recently identified by Staff. Initial responses to new Staff data requests will not be received until after August 28, 2017.
- The Staff Energy Resources Department has a pressing FAC workload:
 - Empire FAC Prudence Hearing: 8/23-24/2017 in Case No. E0-2017-0065;
 - Two FAC prudence review reports both due 8/28/2017: 1st KCPL and 7th KCP&L GMO in Case Nos. EO-2017-0231 and EO-2017-0232 respectively;
 - Two FAC rate adjustment recommendations due: Ameren Missouri due 8/28/2017 in Case No. ER-2017-0030 and KCPL due 8/30/2017 in Case No. ER-2017-0036; and

- Two FAC true-up recommendations due: Ameren Missouri due 8/28/2017 in Case No. ER-2017-0031 and KCPL due 8/30/2017 in Case No. ER-2017-0037

5. Further, Staff believes its requested extension to October 27th prejudices no party and serves the interest of administrative efficiency because it anticipates the extension will provide enough time for discovery to resolve certain accounting discrepancies and such resolution may obviate requests for hearing.

WHEREFORE, for the reasons stated above, the Staff of the Missouri Public Service Commission respectfully requests that it be granted an extension of time to October 27, 2017 to submit its first KCPL FAC prudence report for good cause shown and that the timeline be suspended as provided for under rule 4 CSR 240-20.090(7)(B)1.

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 18th day of August, 2017.

/s/ Robert S. Berlin