

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

In the Matter of Kansas City Power & Light)
Company’s Notice of Intent to File an) File No. EO-2019-0132
Application for Authority to Establish a Demand-)
Side Programs Investment Mechanism)

In the Matter of KCP&L Greater Missouri)
Operations Company’s Notice of Intent to File an) File No. EO-2019-0133
Application for Authority to Establish a Demand-)
Side Programs Investment Mechanism)

**KANSAS CITY POWER & LIGHT COMPANY’S AND
KCP&L GREATER MISSOURI OPERATIONS COMPANY’S
MOTION FOR EXPEDITED TREATMENT**

COMES NOW Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company¹ (collectively “the Company”), and, for their *Motion for Expedited Treatment* (“Motion”) pursuant to 20 CSR 4240-2.080(14), state as follows:

1. On December 16, 2019, the Company filed its *Application for Approval of Modification to Its Technical Resource Manual* (“Application”) with the Missouri Public Service Commission (“Commission”) in the above-captioned dockets.

2. In its Application, the Company requested that the Commission approve the Technical Resource Manual (“TRM”) as revised to be effective on January 1, 2020. The TRM was revised to reflect the Commission’s MEEIA 3 order and also updated with the most recent Evaluation, Measurement and Verification (“EM&V”) information from MEEIA cycle 2. Prior to being filed on December 16, the revised TRM was provided to Staff for review.

¹ Effective October 7, 2019, Evergy Metro Inc. d/b/a Evergy Missouri Metro adopted the service territory and tariffs of KCP&L and Evergy Missouri West, Inc. d/b/a Evergy Missouri West adopted the service territory and tariffs of GMO. However, since the above MEEIA cases were filed using the KCP&L and GMO names, those names will be used in this pleading.

3. Good cause exists for a January 1, 2020 effective date for the revised TRM. A January 1 effective date will ensure that programs can be implemented immediately. Without a TRM associated with the MEEIA programs approved by the Commission's MEEIA 3 order, the Company does not have a basis to begin calculating the level of energy savings associated with a program. In fact, to date, all MEEIA program cycles have operated with an effective TRM at the time of implementation to account for the savings achieved. Additionally, the TRM is regularly updated with new results from EM&V at least annually. Without the level of savings calculation, the Company is not able to calculate the throughput disincentive necessary to appropriately compensate it for offering MEEIA 3 programs. Therefore, the TRM needs to be effective the same day as the MEEIA 3 tariffs.

4. There will be no negative effect on the Company's customers or the general public if the Commission grants this Motion.

5. This Motion was filed as soon as it could have been under the circumstances.

WHEREFORE, for the foregoing reasons and for good cause shown, the Company respectfully requests the Commission grants this Motion for expedited consideration.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for Kansas City Power & Light
Company and KCP&L Greater Missouri
Operations Company**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, to all counsel of record in this case on this 19th day of December 2019.

/s/ Roger W. Steiner

Counsel for Kansas City Power & Light
Company and KCP&L Greater Missouri
Operations Company