

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

In the Matter of Kansas City Power & Light            )  
Company’s Request for Authority to Implement        )        Case No. ER-2014-0370  
A General Rate Increase for Electric Service        )

**PROPOSED PROCEDURAL SCHEDULE**

COMES NOW Kansas City Power & Light Company (“KCP&L” or “Company”) and, on behalf of itself and certain of the other parties<sup>1</sup> – Missouri Public Service Commission (“Commission”) Staff (“Staff”), City of Kansas City, Missouri (“Kansas City”), Brightergy, LLC (“Brightergy”), Missouri Division of Energy (“DE”), IBEW Unions, Laclede Gas Company d/b/a Missouri Gas Energy and Midwest Energy Consumers Group (“MECG”) (collectively, the “Moving Parties”) – respectfully submits the following proposed Procedural Schedule.

**PROCEDURAL SCHEDULE**

1. The Moving Parties request that the Commission adopt the following procedural schedule:

<b><u>Event</u></b>	<b><u>Date</u></b>
Filing Date	10/30/2014
Staff / Intervenor Direct Testimony	4/2/2015
Staff / Intervenor Direct Testimony - Rate Design	4/16/2015
Local Public Hearings	4/20-28/2015
Prehearing Conference	4/29/2015
Rebuttal Testimony	5/7/2015
Settlement Conference	5/27/2015
End of True-up Period <sup>2</sup>	5/31/2015

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<sup>1</sup> United States Department of Energy and Federal Executive Agencies (“DOE/FEA”) have been granted intervention and neither support nor oppose this proposed procedural schedule. Midwest Industrial Energy Consumers (“MIEC”) have been granted intervention and have indicated that they will not join in the proposed procedural schedule but will file a separate pleading. Consumers Council of Missouri (“CCM”) and Sierra Club have been granted intervention and the Office of the Public Counsel (“Public Counsel”) is also a party, but each has specifically withheld authorization to be listed among the Moving Parties at the time of preparation of this pleading. Union Electric Company d/b/a Ameren Missouri has applied for intervention, and that application remains pending.

<sup>2</sup> The Moving Parties intend and understand that the End of True-up Period is the date after which expenditures made by KCP&L are not eligible for consideration in this general rate case. The Moving Parties agree that this does not mean, however, that the La Cygne Environmental Project must meet in-service criteria by May 31, 2015. So long as KCP&L can establish in True-up Direct Testimony that in-service criteria for the La Cygne

Surrebuttal Testimony	6/5/2015
List of Issues/Recon./Stip. Facts/Order Openings, Witnesses and Cross	6/9/2015
Position Statements	6/12/2015
Evidentiary Hearing Week 1	6/15-19/2015
True-up Documentation Provided by KCP&L	6/17/2015
Evidentiary Hearing Week 2	6/29-7/02/2015
True-up Direct Testimony including La Cygne In-Service	7/7/2015
True-up Rebuttal Testimony including La Cygne In-Service	7/14/2015
True-up Hearing	7/20/2015
Initial Briefs	7/22/2015
Reply and True-up Briefs	8/3/2015
Order Date	8/31/2015
Effective Date of Rates	9/29/2015

## DISCOVERY PROCEDURES

2. The Moving Parties request that the Commission adopt the following procedures regarding discovery:

- a) All parties shall provide copies of testimony (including schedules), exhibits and pleadings to other counsel of record by electronic means and in electronic form essentially concurrently with the filing of such testimony, exhibits or pleadings where the information is available in electronic format. Parties are not required to put information that does not exist in electronic format into electronic format for purposes of exchanging it.
- b) Parties shall try to not include highly confidential or proprietary information in data request questions. If either highly confidential or proprietary information must be included in data request questions, the highly confidential or proprietary information will be appropriately designated as such pursuant to 4 CSR 240-2.135.
- c) Data requests issued to or by Staff shall be submitted and responded to in the Commission’s Electronic Filing and Information System (EFIS), if feasible, or in electronic format on compact disc or by other means agreed to by counsel, if infeasible. Counsel for each party shall receive electronically from each other party serving a data request, an electronic copy of the text of the “description” of that data request contemporaneously with service of the data request. Regarding Staff-issued data requests, if the description contains highly confidential or proprietary information, or is voluminous, a hyperlink to the EFIS record of that data request shall be considered a sufficient copy. If a party desires the response to a data request

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Environmental Project have been met, and the Commission determines that the La Cygne Environmental Project is in-service, the Moving Parties agree that capital expenditures associated with the project recorded through May 31, 2015 – whether recorded at May 31, 2015 in plant-in-service or construction work in progress or retirement work in progress accounts – will be eligible for inclusion in rate base in this general rate case.

that has been served on another party, the party desiring a copy of the response must request a copy of the response from the party answering the data request. Data requests, objections to data requests, and notifications respecting the need for additional time to respond to data requests shall be sent by e-mail to counsel for the other parties. Counsel may designate other personnel to be added to the service list for data requests, but shall assume responsibility for compliance with any restrictions on confidentiality. Data request responses shall be served on counsel for the requesting party, unless waived by counsel, and on the requesting party's employee or representative who submitted the data request, and shall be served electronically, if feasible and not voluminous as defined by Commission rule. KCP&L's responses to Staff data requests will be available to other parties on EFIS. In addition, KCP&L's responses to all parties' data requests will be available for review on CaseWorksEX for parties who complete the requirements for accessing the CaseWorksEX system.

- d) Until the filing of Rebuttal testimony, the response time for all data requests shall be 20 calendar days, and 10 calendar days to object or notify that more than 20 calendar days will be needed to provide the requested information. After the filing of Rebuttal testimony and before the filing of Surrebuttal testimony, the response time for data requests shall be 10 calendar days to provide the requested information, and 5 business days to object or notify that more than 10 calendar days will be needed to provide the requested information. After the filing of Surrebuttal testimony, the response time for data requests shall be 5 business days to provide the requested information, and 2 business days to object or notify that more than 5 calendar days will be needed to provide the requested information. Data requests sent after 5:00 pm will be considered served on the next business day. The Commission may rule on discovery motions filed after Surrebuttal testimony is filed without holding the conference required by 4 CSR 240-2.090(8)(B).
- e) Workpapers prepared in the course of developing a witness' testimony (including schedules) and exhibits shall not be filed with the Commission, but shall be submitted to each party within 2 business days following the filing of the particular testimony, unless a party has indicated that it does not want to receive some or all of the workpapers. Workpapers containing highly confidential or proprietary information shall be appropriately marked. Counsel shall undertake to advise other counsel if the sponsored witness has no workpapers related to the round of testimony.
- f) Where workpapers or data request responses include models or spreadsheets or similar information originally in a commonly available format where inputs or parameters may be changed to observe changes in inputs or outputs, if available in that original format, the party providing the workpaper or response shall provide this type of information in that original format with formulas intact. Workpapers shall be provided in electronic format by e-mailing or by delivery of a compact disc or other electronic storage media.
- g) Documents filed in EFIS shall be considered properly served by serving the same on counsel of record for all other parties via e-mail.

- h) Data requests and data request responses in any one of the three following cases may be used in any other of the three following cases: Case Nos. ER-2014-0370, EU-2014-0255 and EU-2015-0094.

### **LOCAL PUBLIC HEARINGS**

3. Subject to the Commission's schedule and the availability of the proposed locations, counsel for KCP&L understands that Public Counsel would propose (and KCP&L and the other Moving Parties either support or do not object) that a local public hearing be held at each of the following locations:

Tuesday, April 21 at 12:00	Martin Community Center 1985 South Odell Avenue Marshall, Missouri 65340
Tuesday, April 21 at 6:00	Lincoln College Preparatory Academy 2111 Woodland Ave. Kansas City, Missouri 64108
Wednesday, April 22 at 6:00	Cohen Conference Center - Kansas City Public Library-Plaza Branch 4801 Main Street, Kansas City, Missouri
Thursday, April 23 at 6:00	Gladstone Community Center 6901 N. Holmes St. Gladstone, Mo. 64118
Monday, April 28 at 6:00	Belton High School 801 West North Avenue Belton, Missouri 64012

4. The Moving Parties request that the Commission issue a subsequent order upon determining the availability of the referenced locations.

5. The Moving Parties agree that the following notice shall be utilized, and mailed as bill inserts to customers as close as possible to but no later than ten (10) days before the commencement of the local public hearings:

#### IMPORTANT NOTICE

On October 30, 2014, Kansas City Power & Light Company d/b/a KCP&L (metropolitan Kansas City, Missouri) filed an electric rate case with the Missouri Public Service Commission (Commission) seeking to increase annual electric operating revenues by approximately \$120 million (15.8%). KCP&L states the increase is necessary because of substantial investments in infrastructure (including federal and state-mandated environmental upgrades at its La Cygne power plant), increasing expenses and inadequate revenues. For the average KCP&L residential customer using 867 kilowatt hours of electricity, the proposed increase would be approximately \$14 per month.

KCP&L has also asked the Commission to establish a Fuel Adjustment Clause (FAC), which would allow KCP&L to recover from, or return to, customers increases or decreases in the cost of fuel, power purchased and transmission costs. The FAC amount would appear as a line item on the bill based on the customer's monthly energy usage. The FAC factor would change every six months, upon review and approval of the Commission, after costs have been incurred.

Public comment hearings have been set before the Commission as follows:

[Insert locations, dates and times here.]

Each hearing will begin with an informal question and answer session. If you are unable to attend a live public hearing and wish to make written comments or secure additional information, you may contact:

The Public Service Commission, P.O. Box 360, Jefferson City, Missouri 65102, telephone: (800) 392-4211, email: [pscinfo@psc.mo.gov](mailto:pscinfo@psc.mo.gov);

The Office of the Public Counsel, P.O. Box 2230, Jefferson City, Missouri 65102, telephone: (866) 922-2959, email: [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov); or

Comments may also be registered in the case using the Public Service Commission's electronic filing and information system ("EFIS") at <https://www.efis.psc.mo.gov/mpsc/Comments.html> and entering "ER-2014-0370" in the "Case/Tracking No." field.

As currently scheduled, the Commission will also conduct evidentiary hearings at its offices in Jefferson City from June 15 through June 19 and June 29 through July 2, 2015, beginning at 8:30 a.m. The current schedule could change, however, so please check the Commission website at <https://www.psc.mo.gov>. The hearings and local public hearings will be held in buildings that meet accessibility standards required by the Americans with Disabilities Act. If a customer needs additional accommodations to participate in these hearings, please call the Commission's Hotline at 1-800-392-4211 (voice) or Relay Missouri at 711 before the hearing.

**TEST YEAR, TRUE-UP, UPDATE PERIOD  
AND CONDITIONAL PROCEDURAL SCHEDULE**

6. The parties shall utilize a test year ending March 31, 2014, updated through December 31, 2014.

7. The true-up period shall end May 31, 2015.

8. In the unlikely event that there are delays in connection with placing the La Cygne Environmental Project in-service, the Moving Parties agree that KCP&L may delay the procedural schedule (and the effective date of rates) by either 30 or 60 days to allow a reasonable amount of time to address the delayed in-service. If this becomes necessary, KCP&L would advise the Commission and the parties no later than May 1, 2015 that either a 30- or 60-day delay is necessary. Any such delay would not change the May 31, 2015 date agreed upon as the end of the true-up period. Specifically, certain procedural schedule events beginning with Rebuttal Testimony would be delayed for either 30 or 60 days. For a 30-day delay, the revised procedural schedule follows:

<b>Event</b>	<b>Date</b>
Rebuttal Testimony	5/18/2015
End of True-up Period	5/31/2015
Settlement Conference	6/2/2015
Surrebuttal Testimony	6/30/2015
Contested Issues Lists/Recon./Stip. Facts/Order of Hearing	7/6/2015
Position Statements	7/9/2015
True-up Documentation Provided by KCP&L	7/17/2015
Evidentiary Hearing	7/20-31/2015
True-up Direct Testimony including La Cygne In-Service	8/10/2015
True-up Rebuttal Testimony including La Cygne In-Service	8/17/2015
True-up Hearing	8/19/2015
Initial Briefs	8/21/2015
Reply and True-up Briefs	9/3/2015
Order Date	9/30/2015
Effective Date of Rates	10/29/2015

For a 60-day delay, the revised procedural schedule follows:

<b>Event</b>	<b>Date</b>
Rebuttal Testimony	5/27/2015
End of True-up Period	5/31/2015
Settlement Conference	6/12/2015
Surrebuttal Testimony	7/14/2015
Contested Issues Lists/Recon./Stip. Facts/Order of Hearing	7/17/2015
Position Statements	7/21/2015
True-up Documentation Provided by KCP&L	8/14/2015
Evidentiary Hearing	8/10-21/2015
True-up Direct Testimony including La Cygne In-Service	9/7/2015
True-up Rebuttal Testimony including La Cygne In-Service	9/14/2015
True-up Hearing	9/21/2015
Initial Briefs	9/23/2015
Reply and True-up Briefs	10/2/2015
Order Date	10/30/2015
Effective Date of Rates	11/29/2015

WHEREFORE, on behalf of the Moving Parties, KCP&L respectfully submits this proposed Procedural Schedule.

Respectfully submitted,

*/s/ Robert J. Hack*

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**Attorneys for Kansas City Power & Light  
Company**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was served upon all counsel of record on this 3<sup>rd</sup> day of December 2014, by either e-mail or U.S. Mail, postage prepaid.

*/s/ Robert J. Hack*

Robert J. Hack