

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

In the Matter of the Determination of Carrying)
Costs for the Phase-In Tariffs of KCP&L Greater)
Missouri Operations Company.)

Case No. ER-2012-0024

STAFF’S RESPONSE TO ORDER

COMES NOW the Staff of the Missouri Public Service Commission and responds to the Commission’s August 17, 2011, *Order Granting Motion to Suspend Procedural Schedule* as follows:

1. In its *Order Granting Motion to Suspend Procedural Schedule*, the Commission directed its Staff to “file a pleading no later than September 6, 2011, notifying the Commission of the status of the parties’ negotiations, and proposing a new procedural schedule” “[i]f the parties have not resolved their disputes by September 6, 2011.”

2. KCP&L Greater Missouri Operations Company filed on September 2, 2011, a non-unanimous settlement agreement with the Commission’s Staff agreeing that the phase-in carrying costs should be based on annual percentage rate of 3.25%. In that agreement, counsel for KCP&L Greater Missouri Operations Company indicated that counsel for The Office of the Public Counsel, Robert Wagner, Dogwood, the Missouri Department of Natural Resources and Ameren Missouri indicated that they will not oppose the agreement. Counsel for the City of St. Joseph indicated that the city takes no position on the agreement, and counsel for AG Processing Inc. indicated AG Processing Inc. will oppose the agreement.

3. While the parties have not resolved their disputes by September 6, 2011, unless and until AG Processing Inc. formally objects to the non-unanimous agreement within the

seven days allotted by Commission rule 4 CSR 240-2.115(2)(B), it would be premature to propose a procedural schedule in this case.

4. Instead of proposing a procedural schedule now, Staff suggests that, if the settlement agreement filed September 2, 2011, is opposed, the Commission set a prehearing conference shortly after September 12, 2011, for the parties to work out a proposed procedural schedule.

WHEREFORE, the Staff of the Missouri Public Service Commission suggests that, if the settlement agreement filed September 2, 2011, is opposed, the Commission set a prehearing conference shortly after September 12, 2011, for the parties to work out a proposed procedural schedule for hearing this case.

Respectfully submitted,

/s/ Nathan Williams

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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 6th day of September, 2011.

/s/ Nathan Williams