BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the 2019 Integrated Resource Plan Annual Update for Kansas City Power & Light)	File No. EO-2019
Company)	
In the Matter of the 2019 Integrated Resource Plan Annual Update for KCP&L Greater Missouri)	File No. EO-2019
Operations Company)	

MOTION FOR EXTENSION OF TIME TO FILE 2019 ANNUAL INTEGRATED RESOURCE PLAN UPDATES

COMES NOW Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO" collectively the "Companies"), by and through undersigned counsel, and hereby request an extension of time to file their 2019 Integrated Resource Plan ("IRP") Annual Updates from the currently required mid-March filing date to August 31, 2019. In support the Companies state as follows:

- 1. KCP&L and GMO last filed their IRP in EO-2018-0268 and EO-2018-0269, respectively, per 4 CSR 240-22, on April 2, 2018. These dockets were closed on November 15, 2018.
- 2. KCP&L and GMO are required to conduct an annual update workshop with stakeholders regarding their 2019 IRP Annual Updates per 4 CSR 240-22.080 (3) on or about April 1, 2019, with IRP Annual Updates filed no less than 20 days prior to that meeting per 4 CSR 240-22.080(3)(B).
- 3. KCP&L and GMO are currently meeting with the Staff to determine the appropriate MEEIA 3 avoided costs to be used for program screening and cost effectiveness testing which is integral to the IRP Annual Update work. DSM screening and cost effectiveness testing impacts the DSM programs to be evaluated as part of the 2019 IRP Updates.

- 4. KCP&L and GMO believe it would be prudent to incorporate the results of these discussions in the 2019 IRP Annual Updates. However, the Companies will need additional time to conduct the integrated resource analysis and prepare the necessary documentation for the 2019 IRP Annual Updates. The Companies anticipate that upon completion of this work, the 2019 IRP Annual Updates can be filed by August 31, 2019. Stakeholder meetings would follow from 20 to 30 days thereafter as stakeholder schedules will allow.
- 5. 4 CSR 240-22.080(15) provides that "The commission may extend or reduce any of the time periods specified in this rule for good cause shown." Given the importance of including the best available DSM program information in their 2019 IRP Annual Updates, there is good cause for the Commission to grant the Companies an extension to August 31, 2019 for the filing of 2019 IRP Annual Updates and to conduct their required stakeholder meetings from 20 to 30 days thereafter.
 - 6. KCP&L's and GMO's next triennial filings are due April 1, 2021.
- 7. Both the Missouri Public Service Commission Staff and the Office of the Public Counsel have indicated that they do not oppose this request.

WHEREFORE, the Companies respectfully request the Commission grant them an extension of time to August 31, 2019 to file their 2019 IRP Annual Updates and to conduct their required stakeholder meetings from 20 to 30 days thereafter.

Respectfully submitted,

s Roger W. Steiner

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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 20th day of February 2019.

|s| Roger W. Steiner

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