

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

Staff of the Missouri Public Service Commission	)	
	)	
Complainant,	)	
	)	
v.	)	File No. EC-2015-0309
	)	
Kansas City Power & Light Company	)	
	)	
And	)	
	)	
KCP&L Greater Missouri Operations Company	)	
	)	
Respondents.	)	

**KANSAS CITY POWER & LIGHT COMPANY’S AND  
KCP&L GREATER MISSOURI OPERATIONS COMPANY’S MOTION  
TO CONTINUE THE MOTION FOR SUMMARY DETERMINATION**

COME NOW Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively, “Respondent” or the “Company”), pursuant to 4 CSR 240-2.117(D), and hereby request that the Commission grant the Company an extension of time to file its response to Staff’s Motion For Summary Determination (“Motion”). In support of this motion, the Company states as follows:

1. On October 6, 2015, Staff filed its Motion and Suggestions in Support. On the same date, the Commission issued its *Order Establishing A Time To Respond To Staff’s Motion For Summary Determination* which established November 5, 2015, as the deadline for any responses to be filed to Staff’s Motion.

2. 4 CSR 240-2.117(D) states:

For good cause shown, the commission may continue the motion for summary determination for a reasonable time to allow an opposing party to conduct such discovery as is necessary to permit a response to the motion for summary

determination.

3. The Company is currently in the process of conducting discovery in this proceeding which may not be completed by November 5, 2015. In fact, the existing approved procedural schedule includes the filing of Rebuttal Testimony by the Company on November 19, 2015 and Surrebuttal Testimony by Staff on December 18, 2015. In addition, the List of Issues is not due until January 6, 2016.

4. Given the present state of testimony and discovery, it is not currently possible to conclude that there are no material issues of disputed fact. Moreover, it is conceivable and perhaps likely that it will not be possible to conclude that there are no material issues of disputed fact until the Staff's Surrebuttal Testimony has been filed, and the responses to any discovery related thereto have been reviewed. In addition, the Staff's proposed List of Issues will also be determinative if there are any factual matters in dispute between the Company and Staff.

5. As a result, Staff's Motion is premature and the Company requests that it be allowed an extension of time to respond Staff's Motion until all testimony is filed, discovery is completed, and the List of Issues has been filed. The Company therefore requests that the deadline for responding to Staff's Motion be extended until January 11, 2016, three working days after the List of Issues is scheduled to be filed.

**WHEREFORE**, the Company respectfully requests that the deadline for responding to Staff's Motion For Summary Determination be extended until January 11, 2016 in order to allow a reasonable opportunity to determine that no material facts are in dispute in this matter, and otherwise allow the Company to respond to the allegations and assertions contained in Staff's Motion.

Respectfully submitted,

/s/ Roger W. Steiner

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**Counsel 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 parties of record this 9<sup>th</sup> day of October, 2015.

/s/ Roger W. Steiner

Roger W. Steiner