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

In the matter of KCP&L Greater Missouri	)	
Operations Company's Application To	)	File No. ET-2014-0059
Suspend Payment Of Certain Solar	)	Tariff No. JE-2014-0112
Rebates.	)	
In the matter of Kansas City Power &	)	
Light Company's Application To	)	File No. ET-2014-0071
Suspend Payment Of Certain Solar	)	Tariff No. JE-2014-0120
Rehates	j	

## MOTION FOR EXPEDITED TREATMENT AND CONSIDERATION OF THE NON-UNANIMOUS STIPULATION AND AGREEMENT FILED ON OCTOBER 3, 2013

COME NOW KCP&L Greater Missouri Operations Company ("GMO") and Kansas City Power & Light Company ("KCP&L") (collectively "Companies"), pursuant to 4 CSR 240-2.080(14), and for their Motion for Expedited Treatment and Consideration Of The Non-Unanimous Stipulation And Agreement filed on October 3, 2013, states as follows to the Missouri Public Service Commission ("Commission"):

- 1. On October 3, 2013, KCP&L, GMO, the Staff of the Missouri Public Service Commission ("Staff"), Office of the Public Counsel, Missouri Division of Energy ("MDOE"), Earth Island Institute d/b/a Renew Missouri ("Renew Missouri"), Missouri Solar Energy Industry Association ("MOSEIA"), Brightergy, LLC ("Brightergy"), and Missouri Industrial Energy Consumers ("MIEC") (collectively "Signatories") filed a Non-Unanimous Stipulation And Agreement ("Agreement") which resolves the issues in these proceedings. The only non-signatories to the Agreement, Union Electric Company d/b/a Ameren Missouri, and Wind On The Wires, have indicated that they do not oppose the Agreement and will not request an evidentiary hearing.
- 2. The Companies respectfully request expedited approval of the Agreement by October 17, 2013, if possible. The Agreement resolves a number of complex issues related to the Companies' Applications which were filed on September 4, 2013, and September 10, 2013,

respectively, and the continued payment of solar rebates in the immediate future. The approval of the Agreement will provide more certainty to customers who are in the process of installing solar facilities, the Solar Industry, as well as the Companies and their ratepayers related to the continued payment of solar rebates. In the event that the Commission has questions regarding the Agreement, the Companies and other Signatories will be available to address them expeditiously.

- 3. There will be no negative effect on the Companies' customers or the general public if the Commission grants this motion and approves the Agreement by October 17, 2013, as requested. However, Section 393.1030(3), RSMo. requires that the Commission decide the issues related to the Companies' Applications within sixty (60) days of the filing of the Applications. In the event that the Commission does not approve the Agreement expeditiously, it will be necessary for the Commission to hold evidentiary hearings to resolve the issues in File No. ET-2014-0059 by November 3, 2013, and in File No. ET-2104-0071 by November 9, 2013. The related tariffs have effective dates of November 3, 2013 (GMO) and November 9, 2013 (KCP&L). Therefore, it is important for the Commission to consider the approval of the Non-Unanimous Stipulation And Agreement.
  - 4. No party to this proceeding objects to this motion.

WHEREFORE, GMO and KCP&L respectfully request that the Commission grant the Motion and approve the pending Non-Unanimous Stipulation And Agreement in File Nos. ET-2014-0059 and ET-2014-0071 by October 17, 2013, if possible.

Respectfully submitted,

## |s| James M. Fischer

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**ATTORNEYS FOR** KCP&L GREATER MISSOURI OPERATIONS COMPANY AND KANSAS CITY POWER & LIGHT 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 4th day of October, 2013.

James M. Fischer