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 A General |) | Case No. ER-2016-0285 |
| Rate Increase for Electric Service |) | |

KANSAS CITY POWER & LIGHT COMPANY'S MOTION FOR A DELAYED IMPLEMENTATION DATE FOR LINE EXTENSION TARIFFS

COMES NOW Kansas City Power & Light Company ("KCP&L" or "Company") and for its Motion, and states as follows:

- 1. In its May 3, 2017 Report and Order, the Missouri Public Service Commission ("Commission") ordered KCP&L to replace its current line extension tariff with one that is identical to or substantially similar to the line extension tariff used by KCP&L Greater Missouri Operations Company. The Commission also ordered compliance tariffs to be filed May 9, 2017. The Company has submitted the line extension compliance tariffs (Sheets 1. 30 1.32A). These tariff sheets have a 30-day effective date with an implementation date of January 1, 2018.
- 2. The seven-month implementation period is necessary for several reasons. This undertaking entails substantial work and changes to Company computer systems, forms, work processes and employee training. Most importantly, the Company needs time to educate developers and builders about the ordered changes. This time will allow those builders and developers an opportunity to understand the process change and determine the appropriate timing for current and future projects. In light of all the work and education that is necessary, the Company is not able to implement the GMO line extension process by May 28, 2017, the operation of law date in this case.
- 3. The adoption by KCP&L of GMO's line extension tariffs was not on the list of issues in this case and therefore the record before the Commission regarding line extension

practices is not well developed. The Commission should be aware that KCP&L's adoption of GMO's line extension tariff will most likely result in higher costs paid by developers for many of the line extensions, particularly subdivision extensions. Additionally, the GMO process requires more upfront money from developers. In light of the changes that are required in order for KCP&L to adopt GMO's line extension tariffs, a seven-month transition period will be needed to allow developers time to adjust to the changes as well as allow projects in-process to be completed. Therefore, KCP&L has built this transition period into its compliance tariffs.

WHEREFORE, KCP&L notifies the Commission that its line extension compliance tariffs have a January 1, 2018 implementation date and request that the Commission approve the compliance tariffs.

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, this 9th day of May, 2017, to all counsel of record.

|s| Roger W. Steiner

Roger W. Steiner

Attorney for Kansas City Power & Light Company