

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

In the Matter of KCP&L Greater Missouri Operations)
Company’s Request for Authority to Implement) Case No. ER-2016-0156
A General Rate Increase for Electric Service)

PROPOSED PROCEDURAL SCHEDULE

COMES NOW KCP&L Greater Missouri Operations Company (“GMO” or “Company”) and, on behalf of the following parties: Missouri Public Service Commission (“Commission”) Staff (“Staff”), the Office of the Public Counsel (“Public Counsel”), Missouri Division of Energy (“DE”), Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”), Brightergy, LLC (“Brightergy”), City of Kansas City, Missouri (“KCMO”), City of St. Joseph, Missouri (“St. Joseph”), Midwest Energy Consumers Group (“MECG”), United for Missouri, Inc. (“UFM”), Dogwood Energy, LLC (“Dogwood”), and Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”)¹ (collectively, the “Parties”), respectfully submits the following Proposed Procedural Schedule.

PROCEDURAL SCHEDULE

1. The Parties request that the Missouri Public Service Commission (“Commission”) adopt the following procedural schedule in this matter.

<u>Event:</u>	<u>Date:</u>
Filing Date	2/23/2016
1 st Technical Conference—Consolidation Issues	4/27-28/2016*
2 nd Technical Conference—Consolidation Issues	5/23-24/2016*
3 rd Technical Conference—Consolidation Issues	6/22-23/2016* ²
Staff / Intervenor Direct Testimony--Revenue Requirement	7/15/2016
Staff / Intervenor Direct Testimony--Rate Design	7/29/2016
Local Public Hearings	After 7/29/2016

¹ Ameren Missouri does not object to the procedural schedule reflected herein, but would note that the timeframes outlined for this case may or may not be appropriate for other rate cases.

² The parties are reserving two days per month for the Technical Conferences to be held in Jefferson City to discuss the consolidation of the L&P and MPS rate jurisdictions and related rate impacts.

End of True-Up Period	7/31/2016
Prehearing Conference	8/04/2016
Rebuttal Testimony	8/15/2016
True-Up Documentation Provided by GMO	8/26/2016
Settlement Conference	9/06/2106
Surrebuttal Testimony	9/12/2016
Contested Issues List	9/14/2016
Position Statements	9/16/2016
Discovery Cut-off	9/16/2016
Evidentiary Hearing Start (8:30 AM)	9/22/2016
Evidentiary Hearing End	9/30/2016
True-Up Direct	10/07/2016
True-Up Rebuttal	10/17/2016
True-Up Hearing (2 Days)	10/20/2016
Briefs (all parties)	10/24/2106
Reply Briefs (all parties)	10/31/2016
Order Date	11/22/2016
Effective Date of Rates	12/22/2016

DISCOVERY ORDER

2. The Parties request that the Commission adopt the following procedures regarding discovery in this case:

- a) All parties shall provide copies of testimony (including schedules), exhibits and pleadings to other counsel of record by electronic means and in electronic form essentially concurrently with the filing of such testimony, exhibits or pleadings where the information is available in electronic format. Parties shall not be required to put information that does not exist in electronic format into electronic format for purposes of exchanging it.
- b) An effort should be made to not include in data request questions either highly confidential or proprietary information. If either highly confidential or proprietary information must be included in data request questions, the highly confidential or proprietary information should be appropriately designated as such pursuant to 4 CSR 240-2.135.
- c) Data requests issued to or by Staff shall be submitted and responded to in the Commission's Electronic Filing and Information System (EFIS), if feasible, or in electronic format on compact disc or by other means agreed to by counsel, if infeasible. Counsel for each party shall receive electronically from each other party, an electronic copy of the text of all data request "descriptions" served by that party on another party in the case contemporaneously with service of the request. If the description contains highly confidential or proprietary information, or is voluminous, a hyperlink to the EFIS record of that data request shall be considered a sufficient copy. If a party desires the response to a data request that has been served on another

- party, the party desiring a copy of the response must request a copy of the response from the party answering the data request – in this manner the party providing a response to a data request has the opportunity to object to providing the response to another party and is responsible for copying information purported to be highly confidential or proprietary – thus, if a party wants a copy of a data request response by GMO to a Staff data request, the party should ask GMO, not the Staff, for a copy of the data request response unless there are appropriate reasons to direct the discovery to the party originally requesting the material. If a data request has been responded to, a party's request for a copy of the response shall be timely responded to, considering that the underlying data request has already been responded to. Data requests, objections, or notifications respecting the need for additional time to respond shall be sent via e-mail to counsel for the other parties. Counsel may designate other personnel to be added to the service list but shall assume responsibility for compliance with any restrictions on confidentiality. Data request responses will be served on counsel for the requesting party and on the requesting party's employee or representative who submitted the data request and shall be served electronically, if feasible and not voluminous as defined by Commission rule. GMO will post its data request responses on CaseworksEX, where other parties who complete the requirements for accessing the CaseWorksEX system may retrieve them.
- d) For data requests issued prior to the Order Establishing Procedural Schedule, the response time for all data requests shall be 20 calendar days, and 10 calendar days to object or notify that more than 20 calendar days will be needed to provide the requested information. For data requests issued after the issuance of the Order Establishing Procedural Schedule, and before the filing of Rebuttal testimony, the response time for data requests shall be 15 calendar days to provide the requested information, and 10 business days to object or notify that more than 15 calendar days will be needed to provide the requested information. For data requests issued after the filing of Rebuttal testimony and before the filing of Surrebuttal testimony, the response time for data requests shall be 10 business days to provide the requested information, and 5 business days to object or notify that more than 10 calendar days will be needed to provide the requested information. For data requests issued after the filing of Surrebuttal testimony, the response time for data requests shall be 5 business days to provide the requested information, and 2 business days to object or notify that more than 5 business days will be needed to provide the requested information. Data requests sent after 5:00 pm will be considered served on the next business day.
- e) Workpapers that were prepared in the course of developing a witness' testimony should not be filed with the Commission but should be submitted to each party within 2 business days following the filing of the particular testimony without further request. Workpapers containing highly confidential or proprietary information should be appropriately marked. Since workpapers for certain parties may be voluminous and generally not all parties are interested in receiving workpapers or a complete set of workpapers, a party shall be relieved of providing workpapers to those parties

indicating that they are not interested in receiving workpapers or a complete set of workpapers. Counsel shall undertake to advise other counsel if the sponsored witness has no workpapers related to the round of testimony.

- f) Where workpapers or data request responses include models or spreadsheets or similar information originally in a commonly available format where inputs or parameters may be changed to observe changes in inputs or outputs, if available in that original format, the party providing the workpaper or response shall provide this type of information in that original format with formulas intact. Workpapers shall be provided in electronic format by e-mailing or by delivery of a compact disc or other electronic storage media.
- g) The last day that parties may issue any discovery requests or conduct a deposition shall be September 16, 2016. This discovery deadline does not apply to true-up issues.
- h) Data requests and data request responses in Case Nos. EO-2014-0043 and ER-2014-0370 may be used in this case, Case No. ER-2016-0156. However, the parties reserve the right to object to the relevance or admissibility of any data request response from these cases.

WHEREFORE, GMO respectfully submits this Proposed Procedural Schedule.

Respectfully submitted,

/s/ Robert J. Hack

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**Attorneys for KCP&L Greater Missouri
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served upon all counsel of record on this 31st day of March 2016, by either e-mail or U.S. Mail, postage prepaid.

/s/ Robert J. Hack _____

Robert J. Hack