

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

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for)
Permission and Approval of a Certificate of)
Public Convenience and Necessity Authorizing)
It to Construct, Install, Own, Operate, Maintain)
and Otherwise Control and Manage Solar)
Generation Facilities in Western Missouri)

Case No. EA-2015-0256

JOINTLY PROPOSED PROCEDURAL SCHEDULE AND PROCEDURES

COME NOW Staff of the Missouri Public Service Commission, Office of Public Counsel, United for Missouri, and in response to the Commission's January 14, 2016, order directing them to "file a joint proposed procedural schedule no later than January 19, 2016," jointly propose the following (NOTE: KCP&L Greater Missouri Operations Company has not agreed to this schedule and will be filing its own joint proposal separately wherein some of the other parties are joining):

1. The following events occur on the following dates:

EVENT	DATE	# DAYS (INITIAL/CUMMULATIVE)		DATE
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Early Prehearing	1/14/2016			1/14/2016
Schedule Filed	1/19/2016	5	5	1/19/2016
Company Direct	1/29/2016	10	15	1/29/2016
Rebuttal	2/29/2016	31	46	2/29/2016
Surrebuttal	3/11/2016	11	57	3/11/2016
Last Day to Request Discovery	3/18/2016	7	64	3/18/2016
List of Issues ... etc.	3/23/2016	5	69	3/23/2016
Position Statements	3/24/2016	1	70	3/24/2016

Hearing Start	3/29/2016	5	75	3/29/2016
Hearing End	3/29/2016	0	75	3/29/2016
Initial Briefs	4/22/2016	24	99	4/22/2016
Reply Briefs	5/13/2016	21	120	5/13/2016

2. The Commission order the parties to follow these procedures for this case:

(a) All parties shall provide copies of testimony (including schedules), exhibits and pleadings to other counsel by electronic means and in electronic format essentially concurrently with the filing of such testimony, exhibits or pleadings where the information is available in electronic format (.PDF, .DOC, .WPD., .XLS, etc.). Parties are not required to put information that does not exist in electronic format into electronic format for purposes of exchanging it.

(b) Counsel for each party shall receive electronically from each other party serving a data request, an electronic copy of the text of the “description” of that data request contemporaneously with service of the data request. Regarding Staff-issued data requests, 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. Data requests, objections to data requests, and notifications respecting the need for additional time to respond to data requests shall be sent by e-mail to counsel for the other parties. Counsel may designate other personnel to be added to the service list for data requests, but shall assume responsibility for compliance with any restrictions on confidentiality. Data request responses shall be served on counsel for the requesting party, unless waived by counsel, 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.

(c) The response time for all data requests commencing with data requests served after the due date for additional direct testimony (Friday, January 29, 2016) is 10 calendar 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. If a data request has been responded to, a party’s request for a copy of the response shall be timely responded to unless the responding party objects, in which case the responding party shall have 5 business days from the request to object. Data requests sent after 5:00 pm will be considered served on the next business day.

(d) Workpapers prepared in the course of developing a witness’ testimony (including schedules) and exhibits shall not be filed with the Commission, but shall be submitted to each party within 2 business days following the filing of the particular testimony, unless a party has indicated that it does not want to receive some or all of the workpapers. Workpapers containing highly confidential or proprietary information shall be appropriately marked.

(e) 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 outputs, if available in that original format, the party providing the workpaper or response shall provide such information in original format with formulas intact.

(f) Documents filed in EFIS shall be considered properly served by serving the same on counsel of record for all other parties via e-mail.

WHEREFORE, the below signed parties jointly request the Commission order the schedule and procedures set forth above.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document, *Jointly Proposed Procedural Schedule and Procedures*, was served via e-mail on all counsel of record this 19th day of January, 2016.

/s/ Steven M. Kretzer