

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

In the Matter of the Joint Application of Great Plains )	
Energy Incorporated, Kansas City Power & Light )	<b><u>Case No. EE-2017-0113</u></b>
Company and KCP&L Greater Missouri Operations )	
Company for a variance from 4 CSR 240-20.015. )	

**Proposed Procedural Schedule**

COMES NOW Midwest Energy Consumers Group (“MECG”); Renew Missouri; City of Independence, Missouri; Laborers’ International Union of North America; Consumers Council of Missouri; IBEW Local Union 412, 1464 and 1613; Missouri Industrial Energy Consumers (“MIEC”), (collectively referred to as “The Parties”) pursuant to the Commission’s November 17, 2017 *Order Finding That Stipulations and Agreement Have Been Objected To and Directing the Parties to File A Proposed Procedural Schedule*, and for their Proposed Procedural Schedule respectfully states as follows:

1. The Parties recommend that the Commission adopt the following Procedural Schedule:

<b><u>Item</u></b>	<b><u>Date</u></b>
Supplemental Direct Testimony	December 9, 2016
Rebuttal Testimony	February 13, 2017
Surrebuttal Testimony	March 2, 2017
List of Issues and List and Order Of Witnesses	March 7, 2017
Position Statements	March 7, 2017
Evidentiary Hearing	March 15-17, 2017 8:30 a.m.

Simultaneous Briefs

April 3, 2017

Commission Order

April 27, 2017

***Discovery Conditions***

2. All parties shall provide workpapers, in electronic format, whenever feasible, within two business days following the date on which the related testimony is filed.

3. 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.

4. All Parties shall provide copies of testimony, schedules, exhibits, and pleadings to other counsel of record by electronic means and in electronic form essentially concurrently with the filing of such testimony, schedules, 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.

5. All parties shall abide by the following discovery with respect to Data Requests:

(A) The response time for all data requests shall be ten (10) calendar days to provide the requested information, and five (5) calendar days to object or to notify the requesting party that more than ten (10) calendar days will be needed to provide the requested information.

6. All parties shall abide by the following provisions regarding discovery:

(A) Discovery conferences shall be held on one week's prior notice to all parties.

(B) Discovery conferences will be held in Room 305 at the Commission's

office at the Governor's Office Building, 200 Madison Street, Jefferson City, Missouri. Each discovery conference will begin at 10:00 a.m.

(C) Not less than two (2) business days before each discovery conference, any party that has a discovery disagreement or concern involving another party shall file a brief statement describing that disagreement or concern and identifying any other parties involved. Such statement does not need to be a formal motion to compel. Any party may attend a discovery conference, but only those parties involved in an identified discovery disagreement must attend.

(D) Discovery conferences shall be on the record and shall be transcribed by a court reporter.

(E) Any pending written discovery motion may be taken up at a discovery conference and may be ruled upon by the presiding regulatory law judge either on the record, or in a written order.

(F) Commission Rule 4 CSR 240-2.090's requirement that a party must seek a telephone conference with the presiding officer before filing a discovery motion is waived.

(G) All data requests, subpoenas, or other discovery requests shall be issued no later than March 7, 2017. With respect to deposing a witness, so long as a notice of deposition is issued by March 7, 2017, the deposition may occur.

(H) All motions to compel a response to any discovery request shall be filed no later than March 14, 2017. The Parties shall make an effort to resolve all discovery disputes well before the hearing; however, the Parties shall present any outstanding motions to compel to the regulatory law judge at the beginning of the hearings on March 15, 2017.

(I) All parties shall make an effort to not include in data request questions either

highly confidential or proprietary information, and parties shall make an effort not to over-designate information as either highly confidential or proprietary. 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. Responsibility to make this designation is upon the party claiming such. Other parties are entitled to rely on the presence or absence of such designation.

(J) Any data requests issued by or to Staff shall be submitted and responded to in the Commission's Electronic Filing and Information System (EFIS). All data requests other than those issued by or to Staff, as well as all objections to data requests, or notifications of the need for additional time to respond, shall be sent by e-mail to counsel for the other parties. Counsel may designate other counsel to be added to the certified service list and shall assume responsibility for compliance with any restrictions on confidentiality. If any party responds to a data request in EFIS, the response is available in EFIS to all counsel on the certified service list. Data request responses, other than responses to data requests issued by or to Staff, will be served on counsel for 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. 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 in writing a copy of the responses from the party answering the data request; thereby providing the responding party the opportunity to object. If a data request has been responded to, a party's request for a copy of the response shall timely be responded to, considering that the underlying data request has already been responded to.

**WHEREFORE,** The Signatories pray that the Commission will establish the Procedural Schedule as set out herein.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

A handwritten signature in black ink, appearing to read "David L. Woodsmall", written in a cursive style.

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David L. Woodsmall

Dated: November 29, 2016