

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

In the Matter of an Investigation Into the)	
Possible Methods of Mitigating Identified)	
Harmful Effects of Entergy Joining MISO on)	<u>File No. EW-2014-0156</u>
non-MISO Missouri Utilities and Their)	
Ratepayers and Maximizing the Benefits)	
for Missouri Utilities and Ratepayers Along)	
RTO and Cooperative Seams)	

JOINT MOTION TO EXTEND TIME FOR FILING

COME NOW, The Empire District Electric Company (“Empire”), Kansas City Power & Light Company (“KCP&L”), and KCP&L Greater Missouri Operations Company (“GMO”) (collectively, the “Companies”), and states as follows to the Missouri Public Service Commission (“Commission”):

1. On November 26, 2013, the Commission created this docket with the issuance of its Order Opening a Case to Investigate Methods of Eliminating or Mitigating the Negative Effects of the MISO/SPP Seam. Therein, the Commission listed several questions concerning regional transmission organization (“RTO”) seams, which it asked the participants to address. By separate order, the Commission directed that responses to the questions listed in the November 26, 2013 order be filed no later than April 1, 2014. The latter order further stated that “any interested party may ask the Commission for additional time to comment beyond the deadline now being set.”

2. There are currently a variety of matters pending before the Federal Energy Regulatory Commission (“FERC”) concerning RTO seams issues in general, and the Southwest Power Pool (“SPP”) and the Midcontinent Independent System Operator (“MISO”) in particular. These FERC matters include the following complaint and tariff dockets:

ER13-948	Entergy Services, Inc. ("ESI") and the Midwest Independent Transmission System Operator, Inc. ("MISO") Filing of Six Attachment O Templates to the MISO Open Access Transmission, Energy and Operating Reserve Markets Tariff to Establish Formula Rates for the Entergy Operating Companies' Recovery of Transmission Revenue Requirements
EL14-21	SPP Complaint for an Order Finding the Midcontinent Independent System Operator, Inc. ("MISO") is Violating the Joint Operating Agreement ("JOA") between SPP and MISO and the SPP Tariff and Requiring MISO to Compensate SPP for Use of SPP's Transmission System
EL14-19	Section 206 Proceeding to Investigate into the Justness and Reasonableness of Midcontinent Independent System Operator, Inc.'s ("MISO") Proposed Regional Through-and-out Rate ("RTOR") for Service over the Transmission System in the MISO South Region
ER14-1174	Unexecuted Firm Point-To-Point Transmission Service Agreement between SPP as Transmission Provider and Midcontinent Independent System Operator, Inc. ("MISO") as Transmission Customer
EL11-34	Midwest Independent Transmission Operator, Inc. ("MISO") Petition for Declaratory Order Seeking Commission Confirmation Regarding Section 5.2 of the Joint Operating Agreement ("JOA") between MISO and SPP
EL14-30	Midcontinent Independent System Operator, Inc. ("MISO") Complaint Regarding Transmission Service Invoices from SPP
ER13-1937, 1938 & 1939	Order 1000 Inter-Regional Filings
ER13-1864	Southwest Power Pool, Inc. Joint Operating Agreement Filings Regarding Market to Market Coordination
ER14-1405, 1406 & 1407	Joint Operating Agreement Revisions

3. The above FERC matters all concern seams issues to one extent or another. Developments in those matters may have a direct impact on the responses to the Commission questions that will/should be provided. Further, the Companies' personnel and other interested parties to this docket are likely to be involved in other key SPP initiatives, including the

aforementioned FERC dockets, and will find it difficult to effectively address the Commission's questions by April 1, 2014. Accordingly, the Companies request that the Commission extend the deadline for providing responses/comments until July 1, 2014.

WHEREFORE, the Companies respectfully request that the Commission issue an order extending the time to file responses to the Commission questions until July 1, 2014.

Respectfully submitted,

//S// Dean L. Cooper
Dean L. Cooper, MBN 36592
BRYDON, SWEARENGEN & ENGLAND P.C.
312 E. Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102
Phone: (573) 635-7166
Fax: (573) 635-3847
E-mail: dcooper@brydonlaw.com

Attorneys for The Empire District Electric Company

//S// Roger W. Steiner
Roger W. Steiner, MBN 39586
Corporate Counsel
Kansas City Power & Light Company
1200 Main Street, 16th Floor
Kansas City, Missouri 64105
Phone: (816) 556-2314
Fax: (816) 556-2787
E-mail: roger.steiner@kcpl.com

Attorney for Kansas City Power & Light Company
and KCP&L Greater Missouri Operations Company

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mailed, to the following on this case this 17th day of March, 2014.

Kevin Thompson
Steve Dottheim
Office of the General Counsel
steve.dottheim@psc.mo.gov
staffcounsel@psc.mo.gov
kevin.thompson@psc.mo.gov

Lewis Mills
Office of the Public Counsel
lewis.mills@ded.mo.gov
opcservice@ded.mo.gov

//S// Dean L. Cooper