BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Complaint Against)	
Kansas City Power & Light Company by)	Docket No. 15-KCPE-544-COM
Stephen and Karen Gradwohl)	

KANSAS CITY POWER & LIGHT COMPANY'S MOTION FOR EXTENSION OF TIME

COMES NOW Kansas City Power & Light Company ("KCP&L"), by and through its counsel and makes the following Motion for Extension of Time to respond to the Report and Recommendation ("R&R") of Staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission" respectively). In support of this Motion, KCP&L states as follows:

- 1. On May 15, 2015, Stephen and Karen Gradwohl filed a formal complaint with the Commission against KCP&L.
 - 2. KCP&L filed its Answer and Motion to Dismiss on June 11, 2015.¹
 - 3. Staff filed its R&R on September 28, 2015.
- 4. KCP&L's response would therefore be due on or before October 8, 2015 pursuant to K.A.R. 82-1-218.
- 5. K.A.R. 82-1-217(b) provides that whenever an act is required or allowed to be done at or within a specified time, the Commission may grant an extension of such time upon a showing of good cause.
 - 6. KCP&L requests until November 9, 2015 to file a response to Staff's R&R.
- 7. The requested extension would permit KCP&L adequate time to gather facts and information related to Staff's R&R. Staff has asserted a new interpretation of the Kansas

¹ An errata was filed on June 12, 2015 containing Attachment D that was inadvertently omitted from the June 11, 2015 filing.

Underground Utility Damage Prevention Act ("KUUDPA") that needs to be fully analyzed prior

to filing a response.

8. Granting KCP&L's Motion serves the public interest because the Commission

needs to know the ramifications of Staff's new interpretation of KUUDPA. The extension will

allow the Company to fully advise the Commission of the ramifications of Staff's interpretation.

9. KCP&L has not previously requested an extension of time to file its response to

Staff's R&R.

10. The requested extension will not impede this proceeding as no schedule has yet

been established, nor will it negatively impact the rights of any party hereto.

11. KCP&L has discussed this extension request with Staff and Staff advised that it

had no objection to the request.

WHEREFORE, for the reasons set forth herein, KCP&L respectfully requests that the

Commission extend the deadline to respond to Staff's R&R until November 9, 2015.

Respectfully submitted,

|s| Roger W. Steiner

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ATTORNEYS FOR KANSAS CITY POWER &

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above was electronically served, hand-delivered or mailed, postage prepaid, this 7^{th} day of October, 2015 to:

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