

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Complaint Against)
Kansas City Power & Light Company) Docket No. 16-KCPE-195-COM
by Jamie Littich.)

**MOTION FOR EXTENSION OF TIME
OF KANSAS CITY POWER & LIGHT COMPANY**

Kansas City Power & Light Company (KCP&L or Company), pursuant to K.A.R. 82-1-217, hereby moves the State Corporation Commission of the State of Kansas (Commission) for an extension until January 30, 2017, to file a response to the Notice of Filing of Staff Report and Recommendation filed in this matter on December 15, 2016 (Staff Report). In support of its motion, KCP&L states:

I. PROCEDURAL BACKGROUND

1. On November 3, 2015, the Commission issued its Order Adopting Legal Memorandum, wherein it directed the complaint filed on October 21, 2015 (Complaint) by Jamie Littich (Complainant), be served on KCP&L.

2. Without reciting each procedural act that has transpired thus far, a series of motions for extension to file responsive pleadings were filed by the parties to the proceeding. Additionally, both KPC&L and Complainant filed responsive pleadings to one another. The last such pleading was filed by KCP&L on February 3, 2016.

3. On March 29, 2016, the Commission issued its *Order Designating Prehearing Officer; and Protective and Discovery Order*. Beyond the filing of nondisclosure certificates by Complainants, no other formal filings have been made in this proceeding until Staff filed its Report on December 15, 2016.

II. DISCUSSION

4. K.A.R. 82-1-218 provides that any party may file a response within ten (10) days of a Notice filing. Ten days from Staff's filing date of December 25, 2016, is December 25, 2016, which is a Sunday. However, K.A.R. 82-1-217(a) states that a period ending in a Saturday, Sunday or legal holiday is extended to the next day that is not a Saturday, Sunday or legal holiday, thereby making the period ending date for a response to Staff's Report Tuesday December 27, 2016.¹

5. The filing of Staff's Report was made one day prior to the filing of Staff and Intervenor testimony in KCP&L's Docket No. 16-KCPE-593-ACQ ("16-593 Docket"), which involves perhaps the largest utility acquisition in the State of Kansas. Due to the number of Intervenors and related witnesses in the 16-593 Docket, as well as the complexity of the issues, KCP&L personnel will be reviewing thousands of pages of testimony over the coming weeks in order to prepare its Rebuttal testimony which is due on January 9, 2017. Staff and Intervenors will also be filing Cross-Answering testimony on December 22, 2016, and at this early date, the magnitude of the Cross-Answering testimony is yet unknown. Not only must KPC&L review voluminous amounts of data and draft its rebuttal testimony, but it must do so during a compressed time frame that includes two major holidays. Many of the personnel who will be working to respond to Staff's Report in this matter are also working on the 16-593 Docket.

6. Additionally, the nature of certain portions of Staff's Report will require extensive time and personnel resources of KCP&L in order to respond accordingly. That said, KCP&L seeks an extension in order to file its response to Staff's Report in this complaint docket.

¹ Monday December 26, 2016 is a legal holiday.

7. KCP&L has discussed its need for an extension with Staff, and Staff advised that it has no objection to an extension until January 30, 2017.

WHEREFORE, KCP&L hereby respectfully requests the Commission grant this Motion allowing KCP&L until January 30, 2017, to file its response Staff's Report and Recommendation.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document was emailed on this 22nd day of December, 2016 to:

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