

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

In the Matter of a General Investigation    )  
of Kansas City Power & Light            )  
Company's All Electric Residential        )  
Rates.                                        )

Docket No. 16-GIME-576-GIE

**MOTION OF CITIZENS' UTILITY RATEPAYER BOARD TO EXTEND  
FILING DEADLINE FOR THIRTY DAYS**

COMES NOW the Citizens' Utility Ratepayer Board (CURB) and hereby moves for an Order from the Commission granting an extension of time of thirty days (from November 7, 2016 to December 6, 2016) for parties to submit a proposed date when reports can be filed with the Commission in this docket. In support thereof, CURB states the following:

1. Under the Procedural Order issued by the Commission in this docket, the parties were granted a period of 45 days from the date of the Order (September 22, 2016) to submit a proposed date when reports can be filed with the Commission.<sup>1</sup> The Commission required certain questions to be addressed in these reports.<sup>2</sup> The deadline upon which the parties shall submit such reports is November 7, 2016.

2. In order to submit a report which addresses the questions outlined by the Commission in the Procedural Order, CURB must retain a consultant from outside the agency. In turn, this requires that CURB work with the Kansas Office of Procurements and Contracts in preparing and posting a Request for Proposal (RFP) and selecting a consultant for this docket.

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<sup>1</sup> Procedural Order, ¶ 7 (September 22, 2016).

<sup>2</sup> Procedural Order, ¶ 5 (September 22, 2016).

3. With due diligence, CURB prepared a RFP and submitted the same to the Kansas Office of Procurements and Contracts on October 4, 2016 which has accepted the RFP. However, CURB has been informed by said office that the Bid Event for CURB's consultant will not close until November 10, 2016. Moreover, after the Bid Event closes, CURB must evaluate the various bids, retain a consultant, and verify a reasonable date when the consultant can submit a report that addresses the questions outlined by the Commission in the Procedural Order. In these regards, should CURB not select the lowest bid, it must justify its choice of consultant with the Kansas Office of Procurements and Contracts. Therefore, it will require more time than the Procedural Order contemplates for CURB to be able to fulfill these requirements and to submit a proposed date when its report can be filed with the Commission in this docket.

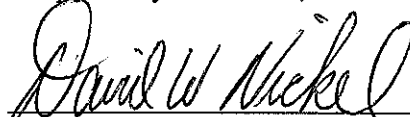
4. In good faith, CURB estimates that it will need until approximately December 6, 2016, to reasonably be able to submit a proposed date when its report can be filed with the Commission. Therefore, CURB requests an extension of the November 7, 2016 deadline to December 6, 2016, for all parties in this docket to submit proposed dates for their reports to be filed.

5. It is in the interest of justice for the Commission to extend the deadline upon which the parties shall submit a proposed date when reports can be filed in this docket, since the Commission desires to have a number of questions comprehensively addressed and input from CURB and other parties will be beneficial to these ends. Furthermore, no prejudice will occur if this motion is granted. The general issues to be addressed by the parties in this docket have existed for a substantial period of time and the extension requested herein will not materially affect the reasonable determination of

the same. CURB is informed that the Commission staff and KCP&L have no objections to the extension of time which is requested herein.

WHEREFORE, CURB respectfully requests that the Commission grant an extension of time of thirty days (from November 7, 2016 to December 6, 2016) for parties to submit a proposed date when reports can be filed with the Commission in this docket, and grant such other relief and the Commission deems proper.

Respectfully submitted,

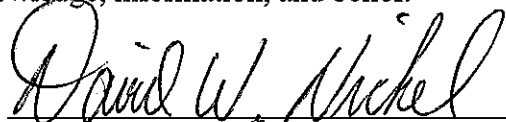


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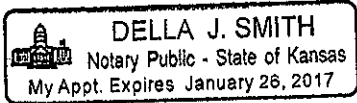
VERIFICATION

STATE OF KANSAS                                 )  
COUNTY OF SHAWNEE                         )     ss:

I, David W. Nickel, of lawful age and being first duly sworn upon my oath, state that I am an attorney for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
David W. Nickel

SUBSCRIBED AND SWORN to before me this 17<sup>th</sup> day of October, 2016.



  
\_\_\_\_\_  
Notary Public

My Commission expires: 01-26-2017.

**CERTIFICATE OF SERVICE**

16-GIME-576-GIE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 17<sup>th</sup> day of October, 2016, to the following parties:

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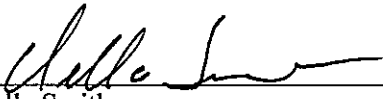
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