

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.)

**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 Second Report and Recommendation ("2nd 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:

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 Ms. Jamie Kathleen Littich ("Complainant"), be served on KCP&L

2. After various pleadings by the parties, including requests for extensions of time to respond by both KCP&L and Complainant, Staff filed its original Report and Recommendation ("1st R&R") on December 15, 2016.

3. Due to the timing of Staff's filing, KCP&L sought an extension of time in which to respond to the Staff's 1st R&R. Complainant filed a similar motion. The Prehearing Officer in this matter granted the motions, allowing KCP&L and Complainant until January 30, 2017 to file responses.¹ Both parties subsequently filed responses.

¹ Prehearing Officer Order Granting Motions for Extension of Time to Respond to Staff's Report and Recommendation, issued Dec. 28, 2016.

4. On March 8, 2017, Staff filed its Second Report and Recommendation (“2nd R&R”).

II. DISCUSSION

5. 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 March 8, 2017, is March 18, 2017, which is a Saturday. 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 2nd R&R Monday, March 20, 2017.

6. The filing of Staff’s 2nd R&R was made at a time when KCP&L personnel are (a) preparing for the evidentiary hearings in KCP&L’s Docket No. 16-KCPE-446-TAR (“16-446 Docket”), scheduled for March 22, 2017 – March 24, 2017; (b) preparing initial comments in KCC Docket No. 16-GIME-403-GIE (“16-403 Docket”) regarding rate design for distributed generation, which comments are due March 17, 2017; and (c) reviewing numerous Staff and Intervenor responsive briefs and preparing a Reply Brief in just seven days in Docket No. 16-KCPE-593-ACQ (“16-593 Docket”). KCP&L’s Reply Brief in the 16-593 Docket is also due on Monday, March 20, 2017. Many of the same personnel needed to respond to Staff’s 2nd R&R are also working to meet these other deadlines.

7. The nature of certain portions of Staff’s Report will require significant time and personnel resources of KCP&L in order to respond accordingly. Therefore, KCP&L requests a 30 day extension until April 17, 2017 to file a response to Staff’s 2nd R&R.

8. 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.

9. KCP&L has discussed this extension request with Staff and Staff advised that it has 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 2nd R&R until April 17, 2017.

Respectfully submitted,

Robert J. Hack (KS #12826)
Telephone: (816) 556-2791
E-mail: Rob.Hack@kcpl.com
Roger W. Steiner (KS #26159)
Telephone: (816) 556-2314
E-mail: Roger.Steiner@kcpl.com
Kansas City Power & Light Company
One Kansas City Place
1200 Main Street – 19th Floor
Kansas City, Missouri 64105
Facsimile: (816) 556-2110

/s/ Terri Pemberton

Terri Pemberton (#23297)
Telephone: (785) 232-2123
CAFER PEMBERTON LLC
3321 SW 6th Avenue
Topeka, Kansas 66606
Facsimile: (785) 233-3040
E-mail: terri@caferlaw.com

**ATTORNEYS FOR KANSAS CITY POWER &
LIGHT COMPANY**

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 17th day of March, 2017 to:

JAMIE KATHLEEN LITTICH
5748 WALMER ST
MISSION, KS 66202
jamiekw73@gmail.com

BRIAN G. FEDOTIN, DEPUTY GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
b.fedotin@kcc.ks.gov

MICHAEL NEELEY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
m.neeley@kcc.ks.gov

/s/ Terri Pemberton

Terri Pemberton