# BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Capital Plan Compliance	)	
Docket for Kansas City Power & Light	)	
Company and Westar Energy, Inc.	)	Docket No. 19-KCPE-096-CPL
Pursuant to the Commission's Order	)	
in Docket No. 18-KCPE-095-MER.	)	

#### JOINT MOTION FOR EXTENSION OF TIME

COME NOW Staff of the Kansas Corporation Commission ("Staff"), Citizens' Utility Ratepayer Board ("CURB"), Kansas City Power & Light Company ("KCP&L"), Westar Energy, Inc. and Kansas Gas and Electric Company ("KG&E") (collectively referred to herein as "Westar"; and all collectively referred to herein as "Joint Parties"), and submit this Joint Motion for Extension of Time:

- 1. In the Commission's Order issued in Docket No. 18-KCPE-095-MER ("18-095 Docket") on May 24, 2018 ("Merger Order"), the Commission approved the Non-Unanimous Settlement Agreement submitted on March 7, 2018, by certain parties to the 18-095 Docket ("Settlement Agreement"). Paragraph 50(iv) of the Settlement Agreement indicates that Staff, CURB, KCP&L and Westar will initiate a Capital Plan Reporting compliance docket to provide capital plan reports and that the goal of the compliance docket will be to determine the appropriate information and data to report and the format of such reporting.
- 2. In paragraph 94 of its Merger Order, the Commission required Westar and KCP&L to work with the parties to develop and submit to the Commission a reporting format for an Integrated Resource Plan ("IRP") process. In its Order Denying Petitions for Reconsideration from the Sierra Club and Kansas Industrial Consumers, paragraph 23, the Commission made it clear that KCP&L, Westar, Staff and CURB should work together to submit the IRP reporting format and that other parties would have the opportunity to comment on the filing after it is made.

- 3. On September 4, 2018, the Joint Parties made a filing with the Commission indicating that they had held meetings to discuss what the capital plan report and IRP reporting framework should include and providing a description of the agreed-upon format for that reporting framework to the Commission. The Joint Parties indicated that they would submit a status update filing to the Commission outlining the progress being made within 45 days of this filing, which would be October 19, 2018.
- 4. On October 16, 2018, the parties filed a Joint Motion for Extension of Time to extend the deadline of their next status update filing to December 3, 2018, citing an inability to make substantial progress regarding the details of the reporting framework due to the press of other business, including three general rate cases before the Commission.
- 5. On November 20, 2018, the parties filed a Joint Motion for Extension of Time to extend the deadline of the next status update filing to January 17, 2019, explaining that Staff had been actively engaged with its consultant on the matter and needed time to collaborate with CURB, Westar, and KCP&L after it received input from its consultant.
- 6. On January 8, 2019, Staff provided an initial draft of its recommendations regarding the IRP reporting framework to KCP&L and Westar. KCP&L and Westar are in the process of reviewing those recommendations and scheduling a time to discuss them with Staff. However, in order to give the parties adequate time to complete the review and hold discussions before making a filing with the Commission, the parties request a four-week extension in order to make their next filing, making such filing due on February 15, 2019.

WHEREFORE, the Joint Parties respectfully request the Commission grant their request for an extension of time.

#### Respectfully submitted,

### |s| Robert J. Hack

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# ATTORNEYS FOR CITZENS' UTILITY RATEPAYER BOARD

#### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed, this 10<sup>th</sup> day of January 2019, to all counsel of record.

## |s| Cathryn J. Dinges

Cathryn J. Dinges