## BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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

Docket No. 19-KCPE-096-CPL

### JOINT MOTION FOR EXTENSION OF TIME

COME NOW, Staff of the State 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 clarified

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 Joint 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 Joint 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 the needed time to collaborate with CURB, Westar, and KCP&L after it received input from its consultant.

6. On January 10, 2019, the Joint Parties filed a Joint Motion for Extension of Time to extend the deadline of the next status update filing until February 15, 2019. This extension was to give KCP&L and Westar sufficient time to review the initial draft of Staff's IRP reporting framework and set a time to discuss them with Staff.

Legislative commitments have precluded the Joint Parties from reaching the
February 15, 2019 deadline. In order to give the parties' adequate time to review the draft IRP

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reporting framework before making a filing with the Commission, the parties request a two-week

extension, making such filing due on March 1, 2019.

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

Respectfully submitted,

|s| Amber Smith

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### FOR COMMISSION STAFF

# <u>|s| Cathryn J. Dinges</u>

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ATTORNEY FOR CITZENS' UTILITY RATEPAYER BOARD

#### VERIFICATION

) ss.

STATE OF KANSAS COUNTY OF SHAWNEE

Amber Smith, of lawful age, being duly sworn upon her oath deposes and states that she is Chief Litigation Counsel for the State Corporation Commission of the State of Kansas; that she has read and is familiar with the foregoing *Joint Motion for Extension of Time*, and attests that the statements therein are true to the best of her knowledge, information and belief.

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Amber Smith, S. Ct. #23911 Chief Litigation Counsel The State Corporation Commission of the State of Kansas

SUBSCRIBED AND SWORN to before me this 14<sup>nd</sup> day of February, 2019.



Vicia D. Jacobsen Notary Public

My Appointment Expires: 6-30-22

#### **CERTIFICATE OF SERVICE**

19-KCPE-096-CPL

I, the undersigned, certify that a true and correct copy of the above and foregoing Joint Motion for Extension of Time was served via electronic service this 14th day of February, 2019, to the following:

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/s/ Vicki Jacobsen

Vicki Jacobsen