BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Complaint Against)	
Kansas City Power & Light Company by)	Docket No. 16-KCPE-109-COM
Toby L. Boschert)	

MOTION OF KANSAS CITY POWER & LIGHT COMPANY FOR EXTENSION OF TIME TO ANSWER FORMAL COMPLAINT

COMES NOW Kansas City Power & Light Company ("KCP&L"), by and through its counsel and makes the following Motion for Extension of Time to Answer the Formal Complaint filed by Toby L. Boschert ("Complainant") on August 31, 2015. In support of this Motion, KCP&L states as follows:

- 1. On August 31, 2015, Complainant filed with the Kansas Corporation Commission ("Commission") a formal complaint against KCP&L ("Formal Complaint").
 - 2. KCP&L received the Formal Complaint on September 14, 2015.
- 3. Pursuant to the provisions of K.A.R. 82-1-220(c) and K.A.R. 82-1-217, KCP&L's answer to the complaint is due within 10 days after service thereof, plus 3 days for mailing. The information served upon KCP&L indicates that the Commission mailed the complaint to KCP&L on September 14, 2015. As such, KCP&L's answer is due in this case by September 24, 2015.
- 4. K.A.R. 82-1-217(b) provides that whenever an act is required or allowed to be done at or within a specified time, the Commission may grant an extension of such time upon a showing of good cause.
- 5. As the parties are currently in discussions in an effort to resolve the alleged dispute without formal litigation, KCP&L believes that the public interest would be best served

if it were given additional time to submit its answer to allow such discussions to continue to conclusion.

- 6. To give the parties time to discuss and resolve the complaint, KCP&L respectfully requests that the Commission postpone the due date for KCP&L's answer to the Formal Complaint for approximately thirty (30) days, or until October 24, 2015.
- 7. Granting KCP&L's Motion serves the public interest because it will give KCP&L and Complainant an opportunity to discuss and potentially resolve the complaint without the expense and inconvenience to both parties of litigation.
 - 8. KCP&L has not previously requested an extension of time to file its answer.
- 9. 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.
- 10. In addition to the request for an extension of time, KCP&L requests that the following individual, as well as counsel identified below, be added to the service list in this docket:

Mary Britt Turner Director, Regulatory Affairs Kansas City Power & Light Company One Kansas City Place 1200 Main Street – 19th Floor Kansas City, Missouri 64105

WHEREFORE, for the reasons set forth herein, KCP&L respectfully requests that the Commission extend the deadline to answer the complaint until October 24, 2015.

Respectfully submitted,

|s| Roger W. Steiner

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 – 16th Floor

Kansas City, Missouri 64105 Facsimile: (816) 556-2787

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 22nd day of September, 2015 to:

AMBER SMITH, CHIEF LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027

TOBY L. BOSCHERT 12725 WENONGA LANE LEAWOOD, KS 66209

|s| Roger W. Steiner

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