



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 – 19<sup>th</sup> 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](mailto:Rob.Hack@kcpl.com)

Roger W. Steiner (KS #26159)

Telephone: (816) 556-2314

E-mail: [Roger.Steiner@kcpl.com](mailto:Roger.Steiner@kcpl.com)

Kansas City Power & Light Company

One Kansas City Place

1200 Main Street – 16<sup>th</sup> 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 22<sup>nd</sup> 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

Roger W. Steiner