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. 15-KCPE-544-COM
Stephen and Karen Gradwohl.)	

MOTION OF KANSAS CITY POWER & LIGHT COMPANY FOR EXTENSION OF TIME TO FILE RESPONSE TO STAFF'S REPORT & RECOMMENDATION

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 Report and Recommendation ("R&R") of Staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission" respectively) filed on September 28, 2015. In support of this Motion, KCP&L states as follows:

- On May 15, 2015, Stephen and Karen Gradwohl filed a formal complaint with the Commission against KCP&L. KCP&L filed its Answer and Motion to Dismiss on June 11, 2015. ¹
- 2. On September 28, 2015, Staff filed its R&R, within which Staff asserts a new interpretation of the term "operator" as contained in the Kansas Underground Utility Damage Prevention Act ("KUUDPA").
- 3. Pursuant to the provisions of K.A.R. 82-1-218, KCP&L's response to Staff's R&R was due October 8, 2015. Because Staff's R&R proposed a new, and much broader, interpretation of the term "operator" under KUUDPA, KCP&L requested and received an extension for filing its response to allow the Company to fully research and analyze the position taken by Staff. As a result of that extension, KCP&L's response is now due November 9, 2015.

¹ An errata was filed on June 12, 2015 containing Attachment D that was inadvertently omitted from the June 11, 2015 filing.

KUUDPA indicate that the issue is more complex and has much broader implications than initially expected. Additional resources have been brought into the effort by KCP&L, but personnel availability and pressing workloads at KCP&L have made it difficult to complete the investigation and preparation of the response in this docket. As such, additional time is

necessary to allow KCP&L to file a thorough response that considers and presents all the legal,

KCP&L's efforts at researching and analyzing Staff's new interpretation of

as well as policy and practical issues, triggered by Staff's R&R.

4.

5. 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. KCP&L is hereby requesting an additional ten (10) days to file its response to Staff's R&R, or until November 19, 2015.

6. The requested extension will not impede this proceeding nor will it negatively impact the rights of any party hereto. KCP&L confirmed that Staff has no objection to this request.

WHEREFORE, for the reasons set forth herein, KCP&L respectfully requests that the Commission extend KCP&L's deadline to respond to Staff's R&R until November 19, 2015.

Respectfully submitted,

|s| Roger W. Steiner

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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 9^{th} day of November, 2015 to:

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