

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Southwest Power Pool, Inc.) Docket No. ER15-1499-001

MOTION FOR PAPER HEARING

Pursuant to Rule 212 of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure,¹ Southwest Power Pool, Inc., (“SPP”) files on behalf of the Active Parties in this proceeding² this motion for a paper hearing. In support of this motion, SPP states that: (i) all Active Parties and Commission Trial Staff (and no other intervenors) have filed pre-filed testimony in this proceeding; (ii) all Active Parties and Commission Trial Staff have agreed to waive cross-examination of all witnesses; (iii) all Active Parties and Commission Trial Staff have agreed to the admission into the record of responses to additional data requests; and (iv) Commission Trial Staff has authorized the Active Parties to state that it supports this motion.

The Active Parties also request that, if this motion is granted, that the briefing schedule set forth in August 12, 2015 Chief Judge’s Order Adopting Procedural Schedule (“Procedural Order”) remain in place.³

In addition, in light of the fact that the hearing in this proceeding is to commence on February 23, 2016, the Active Parties request waiver of Rule 213(d) of the

¹ 18 CFR § 385.212.

² The active Parties in this proceeding are: SPP, City of Independence Missouri, and Kansas City Power & Light Company.

³ The Procedural Order sets the due dates for initial briefs and reply briefs as March 29, 2016 and April 21, 2016, respectively.

Commission's Rules of Practice and Procedure,⁴ to the extent necessary, to permit the Presiding Judge act on this motion expeditiously and without waiting for answers. Waiver is appropriate because all Active Parties agree to this motion and to a paper hearing.

For the reasons stated above, the Active Parties request that this motion for a paper hearing be granted expeditiously.

Respectfully submitted;

Matthew Harward

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⁴ 18 CFR § 385.213.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Little Rock, Arkansas this 17th day of February, 2016.

/s/ Matthew Harward
Matthew Harward
Attorney for
Southwest Power Pool, Inc.