BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Kansas City Power & Light Company for Approval to Make Certain Changes in its Charges for Electric Service to Begin the Implementation of its Regulatory Plan

Case No. ER-2006-0314

STAFF'S RESPONSE TO COMMISSION ORDER RESPECTING TEST YEAR, UPDATE AND TRUE-UP

Comes now the Staff of the Missouri Public Service Commission (Staff) in response to the Missouri Public Service Commission's (Commission) Order And Notice issued on February 3, 2006. In the Commission's Order And Notice, the Commission notes that the Stipulation and Agreement that it approved in Case No. EO-2005-0329 provides for KCPL to file a rate increase case on February 1, 2006 with a historic test year ended December 31, 2005 (initially filed with nine months actual and three months budget data), with updates for known and measurable changes, as of June 30, 2005 [sic],¹ with a true-up through September 30, 2006 and with KCPL filing, on or about October 21, 2006, a reconciliation as of September 30, 2006.

The Staff concurs with the test year, update and true-up provided for at page 30 of the Stipulation And Agreement approved by the Commission in Case No. EO-2005-0329. The Staff also concurs with the following terms set out at page 30 of the Stipulation And Agreement approved by the Commission in Case No. EO-2005-0329:

... The specific list of items to be included in the true-up proceeding shall be mutually agreed upon between KCPL and the Signatory Parties, or ordered by the Commission during the course of the rate case. However, the Signatory Parties anticipate that the true-up items will include, but not necessarily be limited to, revenues including off-system sales, fuel prices and purchased power costs,

¹ The Commission's February 3, 2006 Order And Notice states that the historic test year is to be updated for known and measurable changes as of June 30, 2005. The Stipulation And Agreement approved by the Commission in Case No. EO-2005-0329 provides for an update for known and measurable changes as of June 30, 2006.

payroll and payroll related benefits, plant-in-service, property taxes, depreciation and other items typically included in true-up proceedings before the Commission.

Wherefore, the Staff files this response to the Commission's Order And Notice issued on

February 3, 2006 and recommends the test year, update and true-up as specified at page 30 of the

Stipulation And Agreement in Case No. EO-2005-0329.

Respectfully submitted,

/s/ Kevin A. Thompson

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 6th day of March 2006.

/s/ Kevin A. Thompson