

KCPL GMO  
Case Name: 2019 Sibley Accounting Order Request/Complaint  
Case Number: EC-2019-0200

Response to Woodsmall David Interrogatories - MCEG\_20190530  
Date of Response: 6/18/2019

Question:5-25

Please identify all instances of which GMO is aware in which the Commission considered a utility's earnings in determining whether an event is extraordinary.

Response:

Mr. Ives has not undertaken a study of all Commission AAO cases, but he is of the general opinion that the net income impact of an event is typically considered by the Commission in determining whether an event is extraordinary, although the net income impact is not dispositive of the question of whether the event itself is extraordinary.

Attachment: Q5-25\_Verification.pdf

MCEG Exhibit No. 25  
Date 8-8-19 Reporter Bjt  
File No. EC-2019-0200

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Question:5-32

Would GMO agree that, at the time that KCPL and GMO sought an AAO for renewable energy costs (EU-2012-0131), that the effectiveness of that statute was "anticipated and communicated well in advance"?

Response:

Yes, Mr. Ives would agree with this statement. Mr. Ives is also generally aware that on occasion previously, the Commission has authorized deferral of costs attributable to new State law, policy or Commission rule. It is Mr. Ives opinion that in such cases the Commission has considered the specific facts and circumstances presented and made such determinations consistent with its authority.

Attachment: Q5-32\_Verification.pdf

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Question:5-33

Would GMO agree that, at the time that it sought an AAO for Construction Accounting (EU-2011-0034), that the operation of the Iatan 2 generating station was anticipated and communicated well in advance?

Response:

Yes, Mr. Ives would agree with this statement.

Attachment: Q5-33\_Verification.pdf

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Question:5-37

Please provide all references to any GMO application for an Accounting Authority Order in which GMO asserted that the appropriate standard is whether an event was "anticipated and communicated well in advance."

Response:

Mr. Ives has not undertaken research on this question and cannot presently recall any such circumstances. Regardless, it is Mr. Ives' opinion that the fact that an event has been anticipated and communicated well in advance indicates that it may not be extraordinary under general instruction 7 as interpreted by the Commission.

Attachment: Q5-37\_Verification.pdf