

Company Name: KCPL MO
 Case Description: 2010 KCPL Rate Case
 Case: ER-2010-0355

Jacob
 2206

Response to Cooper Dean Interrogatories – Set MGE_20101214
 Date of Response: 12/21/2010

Question No. :7-8

On pages 7 (line 28) through 8 (line 1) of his Rebuttal Testimony, KCPL witness Gary L. Goble states that “Although a number of other state regulatory commissions have addressed the subject of electric to gas substitution, Mr. Reed fails to mention that most have examined the subject and chosen to reject electric to gas substitution.” (a) Please identify those state regulatory commissions (and related case or matter numbers) Mr. Goble refers to when he states that a “number of other state regulatory commissions have addressed the subject of electric to gas substitution.” (b) Please identify those state regulatory commissions (and related case or matter numbers) Mr. Goble refers to when he states that “most have examined the subject and chosen to reject electric to gas substitution.”

RESPONSE:

a) The table below summarizes the results of an informal survey undertaken by Management Applications Consulting, Inc. Note that none of the surveyed regulatory commissions have mandated the imposition of a fuel switching subsidy as proposed by MGE in this proceeding. In most instances, a benefit-cost test is required to determine whether electric to gas substitution will be required.

Commission	Docket	Decision	Policy	Commission Reviewed			
				Addressed	Rejected	Benefit-Cost Test Dependent	Mandated
Arkansas Public Service Commission	06-004-R	Order 12			Yes		No
Colorado Public Utilities Commission	91R-642E	C92-1646				Yes	No
Connecticut Department of Public Utility Control				No			
Illinois Commerce Commission				No			
Kansas Corporation Commission	09-GIMX-160-GIV			Pending			
Michigan Public Utilities Commission				No			
New Mexico Public Regulation Commission				No			
North Carolina Utilities Commission				No			
Oregon Public Utility Commission (Energy Trust)			4.03.000-P				
Pennsylvania PUC (Act 129)	M-2008-2069887					Yes	No
Texas Public Service Commission						Yes	No
Vermont Public Service Board	5270					Yes	No
Virginia State Corporation Commission				No			
Washington Utilities and Transportation Commission						Yes	No

b) please see the response to part a.

Attachment: Q7-8 MO Verification.pdf

Verification of Response

**Kansas City Power & Light Company
AND
KCP&L Greater Missouri Operations**

Docket No. ER-2010-0355

The response to Data Request # 7-8 is true and accurate to the best of my knowledge and belief.

Signed: Tom Rush

Date: December 21, 2010