

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Kansas City Power & Light Company's Tariff Filing to Implement the MPower Rider	)	Case No.ET-2006-
	)	
	)	

STAFF RECOMMENDATION

Comes now the Staff of the Missouri Public Service Commission (Staff) in response to the filing by Kansas City Power & Light Company (KCPL) of tariff sheets comprising an "MPower Rider" on January 20, 2006, and recommends that the Missouri Public Service Commission (Commission) either issue an Order approving these tariff sheets or permit the tariff sheets to go into effect on March 8, 2006 by operation-of law, pursuant to the tariff sheets being filed with at least 30 days notice and now having an effective date of March 8, 2006. The tariff sheets propose an "MPower Rider" to replace KCPL's current Peak Load Curtailment Credit Rider (PLCC).

Wherefore the Staff recommends that the Commission either issue an Order approving these tariff sheets to go in effect on March 8, 2006 or permit the tariff sheets to go into effect on March 8, 2006 by operation-of law.

Respectfully submitted,

/s/Steven Dottheim

Steven Dottheim
Chief Deputy General Counsel
Missouri Bar No. 29149

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7489 (Telephone)
(573) 751-9285 (Fax)
e-mail: steve.dottheim@psc.mo.gov

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 2nd day of March 2006.

/s/ Steven Dottheim

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. ET-2006-____, File No. JE-2006-0562
Kansas City Power & Light Company

FROM: James Watkins, Manager, Economic Analysis, Project Coordinator
Henry Warren, Regulatory Economist II
Mack McDuffey, Rate & Tariff Examiner II

/s/ James Watkins/ 03-02-2006 /s/ Steven Dottheim/ 03-02-2006
Energy Department / Date General Counsel's Office / Date

SUBJECT: Staff Recommendation For **Approval** of Tariff Sheets Filed To Replace Peak Load
Curtailment Credit Rider (PLCC) with MPower Rider

DATE: March 2, 2006

On January 20, 2006, Kansas City Power & Light Company (KCPL or Company) of Kansas City, Missouri, filed with the Missouri Public Service Commission (Commission) six (6) tariff sheets with a proposed effective date of February 20, 2006. On February 9, 2006, KCPL extended the effective date to March 3, 2006, and on February 27, 2006, KCPL submitted substitute tariff sheets to extended the effective date to March 8, 2006, at the request of the Commission's Energy Department Staff (Staff). The tariff sheets propose an "MPower Rider" (MPower) to replace the current Peak Load Curtailment Credit Rider (PLCC). Like PLCC, MPower is a demand response program as defined in Section 1252 (Smart Metering) of the Energy Policy Act of 2005. This filing is made pursuant to the Demand Response, Efficiency and Affordability Programs section of Appendix C of the Stipulation and Agreement which comprises the Experimental Regulatory Plan approved by the Commission in its July 28, 2005 Report And Order in Case No. EO-2005-0329. The Customer Programs Advisory Group (CPAG) has reviewed this Program.

MPower was designed by KCPL to enhance its load curtailment program based on customer feedback. The most significant modification to PLCC is the addition of a Curtailment Occurrence Payment that provides compensation to customers each time they participate in a load curtailment. This payment is in addition to the fixed Program Participation Payment that provides the same compensation to customers whether or not any curtailments are called, or how many curtailments are called. The MPower Program Participation Payment and Curtailment Occurrence Payment were

designed to provide the same annual compensation to customers that they received under PLCC in 2003 when there were eleven (11) Curtailments.

The table below shows the comparison of the present PLCC rider to the proposed MPower rider.

Common Attributes	PLCC	MPower
Minimum curtailable load	200 kW	
Total curtailment hours per year	120 hours	
Curtailment days	Monday-Friday	
Curtailment hours	12:00 p.m. - 10:00 p.m.	
Duration of curtailment (max.)	8 hours	
Non-compliance penalty	\$1.25/kWh above Firm Power Level	
Reasons for curtailment	Operational or Economic	
Modifications	PLCC	MPower
Program Participation Payment	\$20/kW/year	\$16/kW/year
Curtailment Occurrence Payment	None	\$0.36/kW/event
Initial Payment	To purchase specific equipment necessary for participation	None
Contract length	1 year	See Below
Number of curtailments per year	25	See Below
Notification period	4 hours	See Below
Consecutive curtailment days	5 days	3 days
Curtailment opt-out	None	1 day per season
Energy buy-through option	None	Yes

Contract Term	1-Year	3-Year	5-year
Curtailment season	May - September	May - September	January - December
Notification period	4 hours	2 hours	1 hour
Curtailments per year	25	25	30

KCPL anticipates customer participation to provide the following levels of peak load reduction:

Year	Curtailed Demand (kW)
2006	34,576
2007	40,652
2008	55,066
2009	79,319

The Staff has reviewed the filed tariff sheets, and is of the opinion that they were filed in a timely manner and are in compliance with the Commission's Report And Order. The Staff therefore

recommends that the Commission issue an order approving the following proposed tariff sheets, as filed on January 20, 2006, and substituted on February 27, 2006, to become effective on March 8, 2006, as requested by KCPL, or permit the tariff sheets to go into effect by operation-of-law:

P.S.C. MO. No. 7

Fifth	Revised Sheet No. 21,	Cancelling Fourth	Revised Sheet No. 21
Fifth	Revised Sheet No. 21A,	Cancelling Fourth	Revised Sheet No. 21A
Fifth	Revised Sheet No. 21B,	Cancelling Fourth	Revised Sheet No. 21B
Fourth	Revised Sheet No. 21C,	Cancelling Third	Revised Sheet No. 21C
Fourth	Revised Sheet No. 21D,	Cancelling Third	Revised Sheet No. 21D
Fourth	Revised Sheet No. 21E,	Cancelling Third	Revised Sheet No. 21E

The Staff has verified that this Company is not delinquent on any assessment or the filing of its annual report. The Staff is not aware of any other matter pending before the Commission that affects or is effected by this tariff filing.

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the matter of Kansas City Power & Light
Company's Tariff Filing to Implement The
MPower Rider

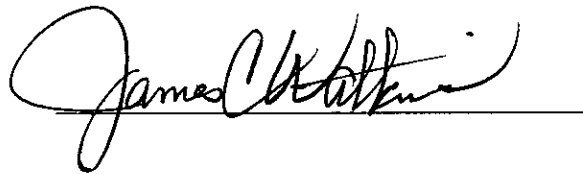
)
)
)
)

Case No. ET-2006-
File No. JE-2006-0562

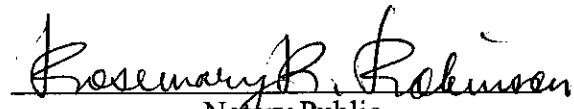
AFFIDAVIT OF JAMES C. WATKINS

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

James C. Watkins, of lawful age, on oath states: that he has participated in the preparation of the foregoing Staff Recommendation; that he has knowledge of the matters set forth in such recommendation; and that such matters are true to the best of his knowledge and belief.



Subscribed and sworn to before me this 2nd day of March, 2006.


Notary Public

My commission expires 9-23-2008

