

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

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

**Case No. ER-2009-0089**  
Tariff No. JE-2009-0192

**STAFF’S RESPONSE TO KANSAS CITY POWER AND  
LIGHT COMPANY’S TEST YEAR AND TRUE-UP PROPOSALS**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), in accordance with the Commission’s September 12, 2008 order and states:

1. In its September 12, 2008 order the Commission stated:

The Commission notes that in Case No. EO-2005-0329, it approved KCPL’s agreement with numerous other signatories to a stipulation that the test year in this case would be based upon a historic test year ending December 31, 2007. The application indicates that the information filed includes twelve months of actual data updated to reflect known and measurable changes through October 31, 2008, with a true-up through April 30, 2009.

2. In its September 12, 2008 order the Commission ordered the Staff, and others, to file, on or before October 14, 2008, their concurrences or recommendations to KCPL’s proposed test year, and their true-up recommendation.

3. In the stipulation and agreement embodying KCPL’s regulatory plan in Missouri (“329 S&A”) that was the subject of Case No. E)-2005-0329, the signatories agreed to an historical test year ending December 31, 2007 (9 mos. actual and 3 mos. budgeted data), with updates for known and measurable changes as of June 30, 2008, and a true-up through September 30, 2008 for a rate filing made on February 1, 2008 with rate schedules bearing effective dates of January 1, 2009.

4. KCPL filed the rate schedules that are the subject of this case on September 5, 2008 based on a test year ending December 31, 2007 (12 mos. actual data), updated to reflect known and measurable changes through October 31, 2008, and trued up through April 30, 2009.

5. KCPL has informed the Staff that changing the update date from October 31, 2008 to September 30, 2008 is acceptable to it. The Commission has scheduled an early prehearing conference for 10:00 a.m. on October 15, 2008.

6. Although different than those agreed to in the 329 S&A, assuming the parties in this case are able to agree upon the use of a 2007 test year, September 30, 2008 update date and April 30, 2009 true-up date, and the parties are able to agree to an appropriate procedural schedule in light of a 2007 test year, September 30, 2008 update date and April 30, 2009 true-up date, then a 2007 test year, September 30, 2008 update date and April 30, 2009 true-up date are acceptable to the Staff.

**WHEREFORE** the Staff submits its conditional concurrence in the use of an historical test year ending December 31, 2007 trued-up through April 30, 2009, as adjusted and updated for any known and measurable changes through September 30, 2008 rather than October 31, 2008. The conditions being that the parties in this case agree upon (1) the use of a 2007 test year, September 30, 2008 update date and April 30, 2009 true-up date and (2) an appropriate procedural schedule in light of a 2007 test year, September 30 2008 update date and April 30, 2009 true-up date.

Respectfully submitted,

/s/ Nathan Williams

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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 14<sup>th</sup> day of October 2008.

/s/ Nathan Williams