

Nowack, Laurie

From: Nowack, Laurie on behalf of Vuylsteke, Diana
Sent: Friday, March 22, 2013 4:34 PM
To: roger.steiner@kcpl.com
Subject: EW-2013-425 MIEC 2nd DR to KCPL GMO
Attachments: EW-2013-0425_MIEC_2nd_DR_to_GMO.pdf

Roger, attached is the MIEC's Second Data Request to KCP&L. Please let me know if you have any questions. Thanks, Diana

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Missouri Industrial Energy Consumers'
Second Set of Data Requests to KCPL GMO
3/22/2013

<u>Item No.</u>	<u>Description</u>
MIEC 2-1.	Please provide complete copies of all documents associated with the Company's periodic earnings monitoring and reporting procedures that have been submitted to the Commission or to Staff since January 1, 2011, to date.
MIEC 2-2.	Does the Company contend that, under present regulatory policies and procedures employed by the Commission, in any of the years 2013 through 2017, it will <u>not</u> have sufficient access to new debt and equity capital in the financial markets at reasonable cost? If your response is affirmative, please explain with specificity <u>each reason</u> why the Company's access to new financial capital is expected to be insufficient under present regulation and provide complete copies of all reports, analyses, projections, workpapers, calculations and other documents relied upon in support of your response.
MIEC 2-3.	Does the Company contend that any element of its currently installed infrastructure is insufficient to provide safe, adequate and reliable service to its customers in Missouri? If your response is affirmative, please describe with specificity <u>each</u> element of current infrastructure that is believed to be insufficient or unsafe and explain how the Company currently plans to remedy such insufficiency; 1) under present regulatory policies and procedures employed by the Commission and, alternatively, 2) under the revised regulatory framework proposed within the current versions of SB 207 / HB 398. Provide complete copies of all reports, analyses, projections, workpapers, calculations and other documents relied upon in support of your response.
MIEC 2-4.	Does the Company contend that Missouri ratepayers will receive any measurable improvement in the quality, safety or reliability of electric utility service as a direct result of implementation of the regulatory changes proposed within SB 207 / HB 398? If your response is affirmative, please explain with specificity and quantify <u>each</u> service quality improvement in <u>each</u> future year that would result from such regulatory changes and explain why such improvements are not achievable under existing regulatory policies and procedures employed by the Commission. Provide complete copies of all reports, analyses, projections, workpapers, calculations and other documents relied upon in support of your response.

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MIEC 2-5.	Does the Company contend that Missouri ratepayers will receive any measurable reduction in the future price of electric utility service as a direct result of implementation of the regulatory changes proposed within SB 207 / HB 398? If your response is affirmative, please explain with specificity and quantify <u>each</u> form of utility cost/price improvement in <u>each</u> future year that would result from such regulatory changes and explain why such cost savings are not achievable under existing regulatory policies and procedures employed by the Commission. Provide complete copies of all reports, analyses, projections, workpapers, calculations and other documents relied upon in support of your response.
MIEC 2-6.	Does the Company contend that the needed and optimally efficient level of new investment in infrastructure for its electric utility business in any of the years 2013 through 2017 is <u>different</u> (any larger or smaller) upon of implementation of the regulatory changes proposed within HB 398 / SB 207, compared to investment levels that are needed and optimally efficient under the present regulatory policies and procedures employed by the Commission? If your response is affirmative, please explain with specificity and quantify <u>each</u> change in the level of needed and optimal infrastructure investments in <u>each</u> future year that would result from such regulatory changes and explain why such revised investment levels are not needed or optimal under existing regulatory policies and procedures employed by the Commission. Provide complete copies of all reports, analyses, projections, workpapers, calculations and other documents relied upon in support of your response.
MIEC 2-7.	Does the Company contend that any of its customers in the past five years have voiced concerns about inadequate levels of electric infrastructure investments by the Company that have contributed to problems associated with the quality, safety or reliability of electric utility service being provided in Missouri under present regulatory policies and procedures employed by the Commission? If your response is affirmative, please identify each customer concern/complaint and provide complete copies of all documents associated with or supportive of your response.
MIEC 2-8.	Have any studies been prepared by or for the Company to evaluate the incremental financial impacts upon the Company of approval of the SB 207 / HB 398 in any future years? If affirmative, please identify each such study, analyses, projection, workpaper and other analysis and provide a complete copy of all documents associated with such efforts.

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<u>Item No.</u>	<u>Description</u>
MIEC 2-9.	Does the Company contend that it will benefit financially through either improved earnings or earnings stability from the expense tracking mechanism the Commission will be required to implement following approval of SB 207/ HB 398? If affirmative, please explain with specificity and quantify the expected financial impact of such an expense tracking mechanism. Provide complete copies of all studies, analyses, projections, workpapers, and other documents relied upon in support of the response hereto.
MIEC 2-10.	Does the Company contend that the Missouri Public Service Commission has or has not previously authorized specific cost deferral and/or expense tracking mechanisms that have benefited the Company financially, either through improved earnings or earnings stability? If the Company has been authorized expense tracking or cost deferrals within prior Commission decisions, please identify with specificity such expense deferrals and/or tracking mechanisms previously authorized by the Commission.