

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

In the Matter of the Application of Kansas)
City Power & Light Company for)
Authority to Extend the Transfer of) Case No. EO-2012-0135
Functional Control of Certain Transmission)
Assets to the Southwest Power Pool, Inc.)

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for)
Authority to Extend the Transfer of) Case No. EO-2012-0136
Functional Control of Certain Transmission)
Assets to the Southwest Power Pool, Inc.)

**KANSAS CITY POWER & LIGHT COMPANY AND
KCP&L GREATER MISSOURI OPERATIONS COMPANY’S
MOTION TO MODIFY STIPULATIONS**

Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively, the “Companies”) hereby file this Motion to Modify Stipulations and state as follows:

1. On June 19, 2013, the Commission approved Stipulations and Agreements in the above captioned dockets (“Stipulations”). Section II.E(1) of the Stipulations contains a provision requiring KCP&L and GMO to conduct a study examining continued participation in a regional transmission organization or its operation under an independent coordinator of transmission. Attachment A to the Stipulations sets forth certain dates for meetings with the Staff of the Missouri Public Service Commission (“Staff”) and the Office of the Public Counsel (“OPC”) concerning the content and planning of the studies. The Stipulations set a deadline of June 30, 2017 for the completion and submission of the study (“2017 Interim Report”).
2. The June 30, 2017 deadline for the Interim Report was extended to June 30, 2020 by Commission order dated June 28, 2017.

3. On June 5, 2019, the Companies met with Staff and OPC to review the cost/benefit study Preliminary Analysis Plan, as required under Section II.E(1) of the Stipulation. The Companies provided a proposal of how the study might be conducted and their estimate of the cost to perform such study, estimated to be over \$600,000 not including internal labor. Additionally, the Companies informed Staff and OPC that the Companies had requested that Southwest Power Pool, Inc., (“SPP”) provide them with a current estimate of the Companies’ exit fee obligations if the Companies were to withdraw from SPP. The combined exit fee estimate for KCP&L and GMO that SPP provided to the Companies is in excess of ** [REDACTED] ** total for KCP&L and GMO, and ** [REDACTED] ** total when also including Evergy subsidiaries Westar, Prairie Wind, and Transource. This estimated SPP exit fee information is attached as Confidential Exhibit A.

4. At the June 5, 2019 meeting the Companies, Staff and OPC discussed the prudence of conducting an SPP cost/benefit study. The estimated exit fee, the cost to conduct the study, and the positive cost/benefit results for the SPP region and for the KCP&L and GMO zones that were indicated in the SPP analyses were considered and discussed. As a result of these meetings and subsequent discussion internally among the Companies, Staff and OPC, Staff and OPC agreed with the Companies’ recommendation that, everything considered, the cost/benefit study, as originally contemplated in the Stipulations, should not be conducted at this time.

5. The Companies request the Commission issue an order stating that the Companies are not required to perform the analysis needed to produce the 2020 Interim Report required by the Stipulations, and that the Companies are not required to produce the 2020 Interim Report as required by Section II.E(4) and Attachment A of the Stipulations.

CONFIDENTIAL

6. The Companies shall still file their next applications regarding continued participation in SPP no later than June 30, 2020 (“June 2020 Applications”), pursuant to Section II.E(4) and Attachment A to the Stipulation. These June 2020 Applications, however, will not include the 2020 Interim Report, as discussed above. The Companies acknowledge that, depending on the requests made by the Companies in the June 2020 Applications, cost/benefit studies are an analysis item that Staff intends to raise in the future respecting the Companies’ continuing participation in the SPP.

7. Counsel for SPP and Dogwood Energy, LLC have indicated that their clients do not object to the relief requested in this motion.

WHEREFORE, the Companies request that the Commission issue an order as described above, which would relieve the Companies of their obligation to conduct studies for and file the 2020 Interim Report.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorney for Kansas City Power & Light
Company and KCP&L Greater Missouri
Operations Company**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all parties of record on this 23rd day August 2019.

/s/ Roger W. Steiner

Roger W. Steiner

**EXHIBIT A
CONTAINS CONFIDENTIAL
INFORMATION
NOT AVAILBLE TO THE PUBLIC.
ORIGINALS FILED UNDER SEAL.**