# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light	)	
Company's Request for Authority to Implement	)	Case No. ER-2014-0370
A General Rate Increase for Electric Service	)	

# JOINT MOTION FOR APPROVAL OF COMPLIANCE TARIFF SHEETS

COMES NOW Kansas City Power & Light Company ("KCP&L") and the Staff of the Missouri Public Service Commission ("Staff") and respectfully request that the Commission approve the compliance tariff sheets KCP&L filed on September 8, 2015, with substitutions on September 11, 2015 (Tariff Nos. YE-2016-0077 and YE-2016-0078), as revised contemporaneously with this motion. In support thereof, KCP&L and Staff state:

1. On September 14, 2015, Staff filed its recommendation regarding KCP&L's September 8 compliance tariff filing (with substitution of a number of sheets thereafter) as directed in the Commission's Report and Order ("Staff's September 14 Recommendation"). In paragraph 2 of the cover pleading to Staff's September 14 Recommendation, Staff stated its belief that the definitions of OSSR and the "J" component in the fuel adjustment clause do not comply with the Report and Order. The tariff provisions Staff believes do not comply with the Report and Order and should not be approved – the definitions of OSSR and the "J" component – relate to the topics KCP&L raised in its September 8, 2015 Motion for Clarification or Reconsideration. On September 15, 2015, Staff filed its Response to KCPL's Motion for Clarification of OSSR (albeit in a slightly different manner than originally proposed by KCP&L) and agreed to a modification of the definition of the "J" component. See paragraphs 1 and 4 of Staff's Response to KCPL's Motion for Clarification or Reconsideration. As reflected in paragraph 1 of Staff's

Response to KCPL's Motion for Clarification or Reconsideration, KCP&L agrees with the alternative modification to the definition of OSSR Staff suggested.

- 2. In addition to changes to the definitions of OSSR and the "J" component, KCP&L has made a number of other changes to the FAC compliance tariff sheets as a result of discussions among the parties. Concurrently herewith KCPL is filing the revised FAC compliance tariff sheets reflecting all agreed-upon changes (Sheet Nos. 50, 50.1, 50.2, 50.3, 50.4, 50.5, 50.6, 50.7, 50.8, 50.9 and 50.10 all P.S.C. MO. No. 7)<sup>1</sup> (bearing an issue date of September 15, 2015 and a proposed effective date of October 15, 2015) in replacement of the FAC compliance tariff sheets KCP&L filed on September 8, 2015.
- 3. Assuming the Commission grants KCP&L's motion for clarification or reconsideration with respect to the definitions of OSSR (with the modifications suggested by Staff) and the "J" component, Staff and KCP&L represent that the compliance tariff sheets filed by KCP&L on September 8, 2015 (with substitution of certain tariff sheets made on September 11, 2015<sup>2</sup> and the withdrawal and refiling of certain FAC tariff sheets on September 15, 2015<sup>3</sup>) comply with the Report and Order and should be approved by the Commission to become effective as soon as reasonably practicable in light of the September 15, 2105, effective date of the Report and Order and the September 29, 2015, suspension date of the KCP&L tariff filing that initiated this case.
- 4. For the reasons set forth in its September 8, 2014 Motion for Expedited Consideration and Approval of Tariff Sheets Filed in Compliance with Commission's Report and Order on Less than Thirty Days' Notice, KCP&L requests that Commission approval of the compliance tariff sheets become effective as soon as practicable in light of the September 15,

<sup>&</sup>lt;sup>1</sup> Exemplar tariff sheets (with issued and effective dates left blank) are attached hereto as Exhibit 1.

<sup>&</sup>lt;sup>2</sup> Sheet Nos. 1.07 and 1.28 (P.S.C. MO. No. 2), and Sheet Nos. 9A, 11B and 43 (P.S.C. MO. No. 7).

<sup>&</sup>lt;sup>3</sup> Sheet Nos. 50, 50.1, 50.2, 50.3, 50.4, 50.5, 50.6, 50.7, 50.8, 50.9 and 50.10 (P.S.C. MO. No. 7).

2015, effective date of the Report and Order and in no event later than September 29, 2015, the

statutory operation of law date based upon the date of the KCP&L tariff filing that initiated this

case.

5. The verifications of Staff personnel Thomas M. Imhoff, Tariffs/Rate Design –

Energy, Mike Scheperle, Economic Analysis, and Dana Eaves, Energy Resource Analysis that

Staff views the compliance tariff sheets KCP&L filed on September 8, 2015, with substitutions

on September 11, 2015 (Tariff Nos. YE-2016-0077 and YE-2016-0078), as revised

contemporaneously with this motion comply with the Commission's Report and Order are

attached.

6. KCP&L and Staff have shared the contents of this pleading with all of the other parties

prior to filing. The following parties have authorized the undersigned to indicate that they have

no opposition to the relief jointly requested by Staff and KCP&L herein: Brightergy.

WHEREFORE, KCP&L and Staff respectfully request that the Commission approve the

compliance tariff sheets as set forth in paragraph 3.

Respectfully submitted,

|s| Nathan Williams

Nathan Williams

Deputy Staff Counsel

Missouri Bar No. 35512

Phone: (573) 751-8702

Fax: (573)751-9285

E-mail: Nathan.williams@psc.mo.gov

Missouri Public Service Commission

P.O. Box 360

Jefferson City, Missouri 65102

Fax:(816) 556-2787

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# |s| Robert J. Hack

Robert J. Hack, MBN 36496 Phone: (816) 556-2791 E-mail: <a href="mailto:rob.hack@kcpl.com">rob.hack@kcpl.com</a> Roger W. Steiner, MBN 39586

Phone: (816) 556-2314

E-mail: <a href="mailto:roger.steiner@kcpl.com">roger.steiner@kcpl.com</a>
Kansas City Power & Light Company

1200 Main – 16<sup>th</sup> Floor

Kansas City, Missouri 64105

Fax: (816) 556-2787

# **Attorneys for Kansas City Power & Light Company**

# **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was served upon all counsel of record on this 15<sup>th</sup> day of September 2015, by either e-mail or U.S. Mail, postage prepaid.

|s| Robert J. Hack

Robert J. Hack

# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light Company's Request for Authority to Implement A General Rate Increase for Electric Service	) ) )	Case No. ER-2014-0370

## **AFFIDAVIT OF DANA E. EAVES**

STATE OF MISSOURI	)
COUNTY OF COLE	) ss
COUNTY OF COLE	,

Dana E. Eaves, of lawful age, on his oath states that he has knowledge of the matters set forth in Staff and Kansas City Power & Light Company's Joint Motion for Approval of Compliance Tariff Sheets as to compliance of the tariff sheets designed to implement the Commission's orders in its Report and Order authorizing Kansas City Power & Light Company to implement a fuel adjustment clause as contained in P.S.C. MO. No. 7; and as to those matters the motion is true to the best of his knowledge and belief.

Dana E. Eaves

Subscribed and sworn to before this 15<sup>th</sup> day of September, 2015.

SUSAN L. SUNDERMEYER
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: October 28, 2018
Commission Number: 14942086

Notary Public

# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

)	
)	Case No. ER-2014-0370
)	
	) )

# AFFIDAVIT OF THOMAS M. IMHOFF

STATE OF MISSOURI	)
	) ss
COUNTY OF COLE	)

Thomas M. Imhoff, of lawful age, on his oath states that he has knowledge of the matters set forth in Staff and Kansas City Power & Light Company's Joint Motion for Approval of Compliance Tariff Sheets as to the compliance of the tariff sheets designed to implement the Commission's orders in its Report and Order; and as to those matters the motion is true to the best of his knowledge and belief.

Subscribed and sworn to before this 15<sup>th</sup> day of September, 2015.

SUSAN L. SUNDERMEYER
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: October 28, 2018
Commission Number: 14942086

# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light	)	
Company's Request for Authority to Implement	)	Case No. ER-2014-0370
A General Rate Increase for Electric Service	)	

# AFFIDAVIT OF MICHAEL S. SCHEPERLE

STATE OF MISSOURI	)
	) ss
COUNTY OF COLE	)

Michael S. Scheperle, of lawful age, on his oath states that he has knowledge of the matters set forth in Staff and Kansas City Power & Light Company's Joint Motion for Approval of Compliance Tariff Sheets as to compliance of the tariff sheets designed to implement the Commission's orders in its Report and Order authorizing Kansas City Power & Light Company to implement a rate increase as contained in P.S.C. MO. No. 7; and as to those matters the motion is true to the best of his knowledge and belief.

Subscribed and sworn to before this 15<sup>th</sup> day of September, 2015.

SUSAN L. SUNDERMEYER Notary Public - Notary Seal State of Missouri Commissioned for Callaway County My Commission Expires: October 28, 2018 Commission Number: 14942086

P.S.C. MO. No.	7	Second	Revised Sheet No	50
Canceling P.S.C. MO. No.	7	First	_ Revised Sheet No	50
			For Missouri Retail Ser	vice Area

FUEL ADJUSTMENT CLAUSE – Rider FAC
FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC
Sorvice Provided Effective Date of Rate Toriffo for ER 2014 0270 and Thereafter

(Applicable to Service Provided Effective Date of Rate Tariffs for ER-2014-0370 and Thereafter)

#### **DEFINITIONS**

ACCUMULATION PERIODS, FILING DATES AND RECOVERY PERIODS: An accumulation period is the six calendar months during which the actual costs and revenues subject to this rider will be accumulated for the purposes of determining the Fuel Adjustment Rate ("FAR"). The two six-month accumulation periods each year through September 30, 2019, the two corresponding twelve-month recovery periods and the filing dates are as shown below. Each filing shall include detailed work papers in electronic format with formulas intact to support the filing.

Accumulation Periods	Filing Dates	Recovery Periods
January – June	By August 1	October – September
July – December	By February 1	April – March

A recovery period consists of the months during which the FAR is applied to retail customer billings on a per kilowatt-hour (kWh) basis.

COSTS AND REVENUES: Costs eligible for the Fuel and Purchased Power Adjustment ("FPA") will be the Company's allocated jurisdictional costs for the fuel component of the Company's generating units, purchased power energy charges including applicable Southwest Power Pool ("SPP") charges, emission allowance costs and amortizations, cost of transmission of electricity by others associated with purchased power and off-system sales, and the costs described below associated with the Company's hedging programs - all as incurred during the accumulation period. These costs will be offset by jurisdictional off-system sales revenues, applicable SPP revenues, and revenue from the sale of Renewable Energy Certificates or Credits ("REC"). Eligible costs do not include the purchased power demand costs associated with purchased power contracts in excess of one year. Likewise revenues do not include demand or capacity receipts associated with power contracts in excess of one year.

#### **APPLICABILITY**

The price per kWh of electricity sold to retail customers will be adjusted (up or down) periodically subject to application of the Rider FAC and approval by the Missouri Public Service Commission ("MPSC" or "Commission").

The FAR is the result of dividing the FPA by forecasted Missouri retail net system input (" $S_{RP}$ ") for the recovery period, expanded for Voltage Adjustment Factors ("VAF"), rounded to the nearest \$0.00001, and aggregating over two accumulation periods. The amount charged on a separate line on retail customers' bills is equal to the current annual FAR multiplied by kWh billed.

Issued: Effective:

P.S.C. MO. No.	7	 Original Sheet No.	50.1
Canceling P.S.C. MO. No.		 Sheet No	

For Missouri Retail Service Area

# FUEL ADJUSTMENT CLAUSE – Rider FAC FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC

(Applicable to Service Provided Effective Date of Rate Tariffs for ER-2014-0370 and Thereafter)

#### FORMULAS AND DEFINITIONS OF COMPONENTS

FPA = 95% \* ((ANEC - B) \* J) + T + I + P

ANEC = Actual Net Energy Costs = (FC + E + PP + TC - OSSR - R)

FC = Fuel Costs Incurred to Support Sales:

The following costs reflected in Federal Energy Regulatory Commission ("FERC") Account Number 501:

Subaccount 501000: coal commodity and transportation, side release and freeze conditioning agents, dust mitigation agents, accessorial charges as delineated in railroad accessorial tariffs [additional crew, closing hopper railcar doors, completion of loading of a unit train and its release for movement, completion of unloading of a unit train and its release for movement, delay for removal of frozen coal, destination detention, diversion of empty unit train (including administration fee, holding charges, and out-of-route charges which may include fuel surcharge), diversion of loaded coal trains, diversion of loaded unit train fees (including administration fee, additional mileage fee or out-of-route charges which may include fuel surcharge), fuel surcharge, held in transit, hold charge, locomotive release, miscellaneous handling of coal cars, origin detention, origin re-designation, out-of-route charges (including fuel surcharge), out-of-route movement, pick-up of locomotive power, placement and pick-up of loaded or empty private coal cars on railroad supplied tracks, placement and pick-up of loaded or empty private coal cars on shipper supplied tracks, railcar storage, release of locomotive power, removal, rotation and/or addition of cars, storage charges, switching, trainset positioning, trainset storage, and weighing], applicable taxes, natural gas costs, fuel quality adjustments, fuel hedging costs, fuel adjustments included in commodity and transportation costs, broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers) and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange), oil costs for commodity, transportation, storage, taxes, fees, and fuel losses, coal and oil inventory adjustments, and insurance recoveries, subrogation recoveries and settlement proceeds for increased fuel expenses in the 501 Accounts.

Subaccount 501020: the allocation of the allowed costs in the 501000, 501300, and 501400 accounts attributed to native load;

Subaccount 501030: the allocation of the allowed costs in the 501000, 501300, and 501400 accounts attributed to off system sales;

Subaccount 501300: fuel additives and consumable costs for Air Quality Control Systems ("AQCS") operations, such as ammonia, hydrated lime, lime, limestone, powder activated carbon, sulfur, and RESPond, or other consumables which perform similar functions:

Subaccount 501400: residual costs and revenues associated with combustion product, slag and ash disposal costs and revenues including contractors, materials and other miscellaneous expenses.

The following costs reflected in FERC Account Number 518:

Subaccount 518000: nuclear fuel commodity and hedging costs;

Subaccount 518201: nuclear fuel waste disposal expense:

Subaccount 518100: nuclear fuel oil.

Issued: Effective:

Issued by: Darrin R. Ives, Vice President

1200 Main, Kansas City, MO 64105

P.S.C. MO. No.	7	 Original Sheet No	50.2
Canceling P.S.C. MO. No.		 Sheet No	

For Missouri Retail Service Area

# FUEL ADJUSTMENT CLAUSE – Rider FAC FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC

(Applicable to Service Provided Effective Date of Rate Tariffs for ER-2014-0370 and Thereafter)

## FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

The following costs reflected in FERC Account Number 547:

Subaccount 547000: natural gas, and oil costs for commodity, transportation, storage, taxes, fees and fuel losses, hedging costs for natural gas, oil, and natural gas used to cross-hedge purchased power or sales, and settlement proceeds, insurance recoveries, subrogation recoveries for increased fuel expenses, and broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers), and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange).

Subaccount 547020: the allocation of the allowed costs in the 547000 and 547300 accounts attributed to native load:

Subaccount 547030: the allocation of the allowed costs in the 547000 and 547300 accounts attributed to off system sales;

Subaccount 547300: fuel additives.

#### E = Net Emission Costs:

The following costs and revenues reflected in FERC Account Number 509:

Subaccount 509000: NOx and SO<sub>2</sub> emission allowance costs and revenue amortizations offset by revenues from the sale of NOx and SO<sub>2</sub> emission allowances including any associated hedging costs, and broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers) and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange).

#### PP = Purchased Power Costs:

The following costs or revenues reflected in FERC Account Number 555:

Subaccount 555005: capacity charges for capacity purchases one year or less in duration; Subaccount 555000: purchased power costs, energy charges from capacity purchases of any duration, insurance recoveries, and subrogation recoveries for purchased power expenses, hedging costs including broker commissions and fees (fees charged by an agent, or agent's company to facilitate transactions between buyers and sellers) and margins (cash or collateral used to secure or maintain the Company's hedge position with a brokerage or exchange), charges and credits related to the SPP Integrated Marketplace ("IM") including, energy, revenue neutrality, make whole and out of merit payments and distributions, over collected losses payments and distributions, Transmission Congestion Rights ("TCR") and Auction Revenue Rights ("ARR") settlements, virtual energy costs, revenues and related fees where the virtual energy transaction is a hedge in support of physical operations related to a generating resource or load, load/export charges, ancillary services including non-performance and distribution payments and charges and other miscellaneous SPP Integrated Market charges including uplift charges or credits;

Subaccount 555021: the allocation of the allowed costs in the 555000 account attributed to intercompany purchases for native load;

Subaccount 555030: the allocation of the allowed costs in the 555000 account attributed to purchases for off system sales;

Subaccount 555031: the allocation of the allowed costs in the 555000 account attributed to intercompany purchases for off system sales.

Issued: Effective:

P.S.C. MO. No	7	_	Original Sheet No	50.3
Canceling P.S.C. MO. No.		_	 Sheet No	

For Missouri Retail Service Area

# FUEL ADJUSTMENT CLAUSE – Rider FAC FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC

(Applicable to Service Provided Effective Date of Rate Tariffs for ER-2014-0370 and Thereafter)

#### FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

#### TC = Transmission Costs:

The following costs reflected in FERC Account Number 565:

Subaccount 565000: non-SPP transmission used to serve off system sales or to make purchases for load and 7.3% of the SPP transmission service costs which includes the schedules listed below as well as any adjustments to the charges in the schedules below:

Schedule 7 - Long Term Firm and Short Term Point to Point Transmission Service

Schedule 8 - Non Firm Point to Point Transmission Service

Schedule 9 – Network Integration Transmission Service

Schedule 10 - Wholesale Distribution Service

Schedule 11 - Base Plan Zonal Charge and Region Wide Charge

Subaccount 565020: the allocation of the allowed costs in the 565000 account attributed to native load:

Subaccount 565027: the allocation of the allowed costs in the 565000 account attributed to transmission demand charges:

Subaccount 565030: the allocation of the allowed costs in account 565000 attributed to off system sales.

#### OSSR = Revenues from Off-System Sales:

The following revenues or costs reflected in FERC Account Number 447:

Subaccount 447002: all revenues from off-system sales. This includes charges and credits related to the SPP IM including, energy, ancillary services, revenue sufficiency (such as make whole payments and out of merit payments and distributions), revenue neutrality payments and distributions, over collected losses payments and distributions, TCR and ARR settlements, demand reductions, virtual energy costs and revenues and related fees where the virtual energy transaction is a hedge in support of physical operations related to a generating resource or load, generation/export charges, ancillary services including non-performance and distribution payments and SPP uplift revenues or credits. Off-system sales revenues from full and partial requirements sales to municipalities that are served through bilateral contracts in excess of one year shall be excluded from OSSR component;

Subaccount 447012: capacity charges for capacity sales one year or less in duration;

Subaccount 447030: the allocation of the includable sales in account 447002 not attributed to retail sales.

# R = Renewable Energy Credit Revenue:

Revenues reflected in FERC account 509000 from the sale of Renewable Energy Credits that are not needed to meet the Renewable Energy Standard.

Any cost identified above which is a Missouri-only cost shall be grossed up by the current kWh energy factor, included in the ANEC calculation and allocated as indicated in component J below. Any cost identified above which is a Kansas-only cost shall be excluded from the ANEC calculation.

Issued: Effective:

Issued by: Darrin R. Ives, Vice President

P.S.C. MO. No.	7	 Original Sheet No	50.4
Canceling P.S.C. MO. No.		 Sheet No	

For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC

(Applicable to Service Provided Effective Date of Rate Tariffs for ER-2014-0370 and Thereafter)

#### FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

Hedging costs are defined as realized losses and costs (including broker commissions, fees, and margins) minus realized gains associated with mitigating volatility in the Company's cost of fuel, fuel additives, fuel transportation, emission allowances, transmission and power purchases or sales, including but not limited to, the Company's use of derivatives whether over-the counter or exchange traded including, without limitation, futures or forward contracts, puts, calls, caps, floors, collars, swaps, TCRs, virtual energy transactions, or similar instruments.

Costs and revenues not specifically detailed in Factors FC, PP, E, TC, OSSR, or R shall not be included in the Company's FAR filings; provided however, in the case of Factors PP, TC or OSSR, the market settlement charge types under which SPP or another centrally administered market (e.g., PJM or MISO) bills/credits a cost or revenue need not be detailed in Factors PP or OSSR for the costs or revenues to be considered specifically detailed in Factors PP or OSSR; and provided further, should the SPP or another centrally administered market (e.g. PJM or MISO) implement a new market settlement charge type not listed below or a new schedule not listed in TC:

- A. The Company may include the new schedule, charge type cost or revenue in its FAR filings if the Company believes the new schedule, charge type cost or revenue possesses the characteristics of, and is of the nature of, the costs or revenues listed below or in the schedules listed in TC, as the case may be, subject to the requirement that the Company make a filing with the Commission as outlined in B below and also subject to another party's right to challenge the inclusion as outlined in E. below;
- B. The Company will make a filing with the Commission giving the Commission notice of the new schedule or charge type no later than 60 days prior to the Company including the new schedule, charge type cost or revenue in a FAR filing. Such filing shall identify the proposed accounts affected by such change, provide a description of the new charge type demonstrating that it possesses the characteristics of, and is of the nature of, the costs or revenues listed in factors PP, TC or OSSR as the case may be, and identify the preexisting schedule, or market settlement charge type(s) which the new schedule or charge type replaces or supplements;
- C. The Company will also provide notice in its monthly reports required by the Commission's fuel adjustment clause rules that identifies the new schedule, charge type costs or revenues by amount, description and location within the monthly reports;
- D. The Company shall account for the new schedule, charge type costs or revenues in a manner which allows for the transparent determination of current period and cumulative costs or revenues;

Issued: Effective:

F	P.S.C. MO. No.	7		Original Sheet No	50.5
Canceling F	P.S.C. MO. No.			Sheet No.	

For Missouri Retail Service Area

FUEL ADJUSTMENT CLAUSE – Rider FAC FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC

(Applicable to Service Provided Effective Date of Rate Tariffs for ER-2014-0370 and Thereafter)

#### FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

- E. If the Company makes the filing provided for in B above and a party challenges the inclusion, such challenge will not delay approval of the FAR filing. To challenge the inclusion of a new schedule or charge type, a party shall make a filing with the Commission based upon that party's contention that the new schedule, charge type costs or revenues at issue should not have been included, because they do not possess the characteristics of the schedules, costs or revenues listed in Factors PP, TC or OSSR, as the case may be. A party wishing to challenge the inclusion of a schedule or charge type shall include in its filing the reasons why it believes the Company did not show that the new schedule or charge type possesses the characteristics of the costs or revenues listed in Factors TC, PP or OSSR, as the case may be, and its filing shall be made within 30 days of the Company's filing under B above. In the event of a timely challenge, the Company shall bear the burden of proof to support its decision to include a new schedule or charge type in a FAR filing. Should such challenge be upheld by the Commission, any such costs will be refunded (or revenues retained) through a future FAR filing in a manner consistent with that utilized for Factor P: and
- F. A party other than the Company may seek the inclusion of a new schedule or charge type in a FAR filing by making a filing with the Commission no less than 60 days before the Company's next FAR filing date of August 1 or February 1. Such a filing shall give the Commission notice that such party believes the new schedule or charge type should be included because it possesses the characteristics of, and is of the nature of, the costs or revenues listed in factors PP, TC or OSSR, as the case may be. The party's filing shall identify the proposed accounts affected by such change, provide a description of the new schedule or charge type demonstrating that it possesses the characteristics of, and is of the nature of, the schedules, costs or revenues listed in factors PP, TC or OSSR as the case may be, and identify the preexisting schedule or market settlement charge type(s) which the new schedule or charge type replaces or supplements. If a party makes the filing provided for by this paragraph F and a party (including the Company) challenges the inclusion, such challenge will not delay inclusion of the new schedule or charge type in the FAR filing or delay approval of the FAR filing. To challenge the inclusion of a new schedule or charge type, the challenging party shall make a filing with the Commission based upon that party's contention that the new schedule or charge type costs or revenues at issue should not have been included, because they do not possess the characteristics of the schedules, costs or revenues listed in Factors PP, TC, or OSSR, as the case may be. The challenging party shall make its filing challenging the inclusion and stating the reasons why it believes the new schedule or charge type does not possess the characteristic of the costs or revenues listed in Factors PP, TC or OSSR, as the case may be, within 30 days of the filing that seeks inclusion of the new schedule or charge type. In the event of a timely challenge, the party seeking the inclusion of the new schedule or charge type shall bear the burden of proof to support its contention that the new schedule or charge type should be included in the Company's FAR filings. Should such challenge be upheld by the Commission, any such costs will be refunded (or revenues retained) through a future FAR filing in a manner consistent with that utilized for Factor P.

Issued: Effective:

P.S.C. MO. No.	7		Original Sheet No	50.6
Canceling P.S.C. MO. No.			Sheet No	

For Missouri Retail Service Area

# FUEL ADJUSTMENT CLAUSE – Rider FAC FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC

(Applicable to Service Provided Effective Date of Rate Tariffs for ER-2014-0370 and Thereafter)

#### FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

SPP IM charge/revenue types that are included in the FAC are listed below:

Day Ahead Regulation Down Service Amount

Day Ahead Regulation Down Service Distribution Amount

Day Ahead Regulation Up Service Amount

Day Ahead Regulation Up Service Distribution Amount

Day Ahead Spinning Reserve Amount

Day Ahead Spinning Reserve Distribution Amount

Day Ahead Supplemental Reserve Amount

Day Ahead Supplemental Reserve Distribution Amount

Real Time Contingency Reserve Deployment Failure Amount

Real Time Contingency Reserve Deployment Failure Distribution Amount

Real Time Regulation Service Deployment Adjustment Amount

Real Time Regulation Down Service Amount

Real Time Regulation Down Service Distribution Amount

Real Time Regulation Non-Performance

Real Time Regulation Non-Performance Distribution

Real Time Regulation Up Service Amount

Real Time Regulation Up Service Distribution Amount

Real Time Spinning Reserve Amount

Real Time Spinning Reserve Distribution Amount

Real Time Supplemental Reserve Amount

Real Time Supplemental Reserve Distribution Amount

Day Ahead Asset Energy

Day Ahead Non-Asset Energy

Day Ahead Virtual Energy Amount

Real Time Asset Energy Amount

Real Time Non-Asset Energy Amount

Real Time Virtual Energy Amount

Transmission Congestion Rights Funding Amount

Transmission Congestion Rights Daily Uplift Amount

Transmission Congestion rights Monthly Payback Amount

Transmission Congestion Rights Annual Payback Amount

Transmission Congestion Rights Annual Closeout Amount Transmission Congestion Rights Auction Transaction Amount

Auction Revenue Rights Funding Amount

Auction Revenue Rights Uplift Amount

Auction Revenue Rights Monthly Payback Amount

Auction Revenue Annual Payback Amount

Auction Revenue Rights Annual Closeout Amount

Day Ahead Virtual Energy Transaction Fee Amount

Day Ahead Demand Reduction Amount

Day Ahead Grandfathered Agreement Carve Out Daily Amount

Grandfathered Agreement Carve Out Distribution Daily Amount

Issued: Effective:

P.S.C. MO. No7	Original Sheet No. 50.7
Canceling P.S.C. MO. No.	Sheet No
	For Missouri Retail Service Area

# FUEL ADJUSTMENT CLAUSE – Rider FAC FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC

(Applicable to Service Provided Effective Date of Rate Tariffs for ER-2014-0370 and Thereafter)

#### FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

SPP IM charge/revenue types that are included in the FAC (continued)

Day Ahead Grandfathered Agreement Carve Out Monthly Amount

Grandfathered Agreement Carve Out Distribution Monthly Amount

Day Ahead Grandfathered Agreement Carve Out Yearly Amount

Grandfathered Agreement Carve Out Distribution Yearly Amount

Day Ahead Make Whole Payment Amount

Day Ahead Make Whole Payment Distribution Amount

Day Ahead Over Collected Losses Distribution Amount

Miscellaneous Amount

Reliability Unit Commitment Make Whole Payment Amount

Real Time Out of Merit Amount

Reliability Unit Commitment Make Whole Payment Distribution Amount

Over Collected Losses Distribution Amount

Real Time Joint Operating Agreement Amount

Real Time Reserve Sharing Group Amount

Real Time Reserve Sharing Group Distribution Amount

Real Time Demand Reduction Amount

Real Time Demand Reduction Distribution Amount

Real Time Pseudo Tie Congestion Amount

Real Time Pseudo Tie Losses Amount

Unused Regulation Up Mileage Make Whole Payment Amount

Unused Regulation Down Mileage Make Whole Payment Amount

Revenue Neutrality Uplift Distribution Amount

Should FERC require any item covered by components FC, E, PP, TC, OSSR or R to be recorded in an account different than the FERC accounts listed in such components, such items shall nevertheless be included in component FC, E, PP, TC, OSSR or R. In the month that the Company begins to record items in a different account, the Company will file with the Commission the previous account number, the new account number and what costs or revenues that flow through the Rider FAC to be recorded in the account.

B = Net base energy costs ordered by the Commission in the last general rate case consistent with the costs and revenues included in the calculation of the FPA. N e t Base Energy costs will be calculated as shown below:

S<sub>AP</sub> x Base Factor ("BF")

 $S_{AP}$  = Net system input ("NSI") in kWh for the accumulation period

BF = Company base factor costs per kWh: \$0.01186

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FUEL ADJUSTMENT CLAUSE – Rider FAC FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC

(Applicable to Service Provided Effective Date of Rate Tariffs for ER-2014-0370 and Thereafter)

#### FORMULAS AND DEFINITIONS OF COMPONENTS (continued)

J = Missouri Retail Energy Ratio = (MO Retail kWh sales + MO Losses) / (MO Retail kWh Sales + MO Losses + KS Retail kWh Sales + KS Losses + Sales for Resale, Municipals kWh Sales [includes border customers] + Sales for Resale, Municipals Losses)

MO Losses = 6.121%; KS Losses = 6.298%; Sales for Resale, Municipals Losses = 21.50%

T = True-up amount as defined below.

Interest applicable to (i) the difference between Missouri Retail ANEC and B for all kWh of energy supplied during an AP until those costs have been recovered; (ii) refunds due to prudence reviews ("P"), if any; and (iii) all under- or over-recovery balances created through operation of this FAC, as determined in the true-up filings ("T") provided for herein. Interest shall be calculated monthly at a rate equal to the weighted average interest paid on the Company's short-term debt, applied to the month-end balance of items (i) through (iii) in the preceding sentence.

P = Prudence disallowance amount, if any, as defined in this tariff.

 $FAR = FPA/S_{RP}$ 

Single Accumulation Period Secondary Voltage FARSec = FAR \* VAFSec Single Accumulation Period Primary Voltage FARPrim = FAR \* VAFPrim

Annual Secondary Voltage  $FAR_{Sec}$  = Aggregation of the two Single Accumulation Period Secondary Voltage FARs still to be recovered

Annual Primary Voltage FAR<sub>Prim</sub> = Aggregation of the two Single Accumulation Period Primary Voltage FARs still to be recovered

Where:

FPA = Fuel and Purchased Power Adjustment

S<sub>RP</sub> = Forecasted recovery period Missouri retail NSI in kWh, at the generator

VAF = Expansion factor by voltage level

VAFSec = Expansion factor for lower than primary voltage customers VAFPrim = Expansion factor for primary and higher voltage customers

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FUEL ADJUSTMEN	NT CLAUSE – Rider FAC
FUEL AND PURCHASE PO	OWER ADJUSTMENT ELECTRIC

(Applicable to Service Provided Effective Date of Rate Tariffs for ER-2014-0370 and Thereafter)

# TRUE-UPS

After completion of each RP, the Company shall make a true-up filing by the filing date of its next FAR filing. Any true-up adjustments shall be reflected in component "T" above. Interest on the true-up adjustment will be included in component "I" above.

The true-up amount shall be the difference between the revenues billed and the revenues authorized for collection during the RP as well as any corrections identified to be included in the current FAR filing. Any corrections included will be discussed in the testimony accompanying the true-up filing.

#### PRUDENCE REVIEWS

Prudence reviews of the costs subject to this Rider FAC shall occur no less frequently than every eighteen months, and any such costs which are determined by the Commission to have been imprudently incurred or incurred in violation of the terms of this Rider FAC shall be returned to customers. Adjustments by Commission order, if any, pursuant to any prudence review shall be included in the FAR calculation in component "P" above unless a separate refund is ordered by the Commission. Interest on the prudence adjustment will be included in component "I" above.

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P.S.C. MO. No.	7	 Original Sheet No	50.10
Canceling P.S.C. MO. No.		Sheet No	_

For Missouri Retail Service Area

# FUEL ADJUSTMENT CLAUSE – Rider FAC FUEL AND PURCHASE POWER ADJUSTMENT ELECTRIC (Applicable to Service Provided Effective Date of Rate Tariffs for ER-2014-0370 and Thereafter)

Accı	umulation Period Ending:		Month dd, yyyy
			KCPL-MO
1	Actual Net Energy Cost (ANEC) = (FC+E+PP+TC-OSSR-R)		\$0
2	Net Base Energy Cost (B)	-	\$188,821,056
	2.1 Base Factor (BF)		\$0.01186
	2.2 Accumulation Period NSI (S <sub>AP</sub> )		15,926,946,938
3	(ANEC-B)		\$(
4	Jurisdictional Factor (J)	*	0%
5	(ANEC-B)*J		\$0
6	Customer Responsibility	*	95%
7	100% *((ANEC-B)*J)		\$(
8	True-Up Amount (T)	+	\$0
9	Interest (I)	+	\$0
10	Prudence Adjustment Amount (P)	+	\$0
11	Fuel and Purchased Power Adjustment (FPA)	=	\$0
12	Estimated Recovery Period Retail NSI (S <sub>RP</sub> )	÷	
13	Current Period Fuel Adjustment Rate (FAR)	=	\$0.0000
14	Current Period FAR <sub>Prim</sub> = FAR x VAF <sub>Prim</sub>		\$0.0000
15	Prior Period FAR <sub>Prim</sub>	+	\$0.0000
16	Current Annual FAR <sub>Prim</sub>		\$0.0000
17	Current Period FAR <sub>Sec</sub> = FAR x VAF <sub>Sec</sub>		\$0.0000
18	Prior Period FAR <sub>Sec</sub>	+	\$0.0000
19	Current Annual FAR <sub>Sec</sub>		\$0.0000
	VAF <sub>Prim</sub> = 1.0452		
	VAF <sub>Sec</sub> = 1.0707		

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