

**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.)

**JOINT MOTION OF KANSAS CITY POWER & LIGHT COMPANY,
KCP&L GREATER MISSOURI OPERATIONS COMPANY, STAFF
OF THE MISSOURI PUBLIC SERVICE COMMISSION,
OFFICE OF THE PUBLIC COUNSEL, AND DOGWOOD ENERGY, LLC
TO MODIFY STIPULATIONS**

Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively, the “Companies”) and the Staff of the Missouri Public Service Commission (“Staff”), the Office of the Public Counsel (“OPC”), and Dogwood Energy, LLC (“Dogwood”) (individually, “Party” and collectively, “Parties”) hereby file this Joint Motion to Further Modify Stipulation and Agreements (“Joint Motion”) and state as follows:

1. On June 19, 2013, the Commission approved separate Stipulation and Agreements in the above captioned dockets, which were filed on May 16, 2013 (“May 16, 2013 Stipulations”). Section II.E(4) of the May 16, 2013 Stipulations contains a provision requiring KCP&L and GMO to file a pleading by June 30, 2017 (“June 30, 2017 Pleading”) regarding its continued participation in a regional transmission organization (“RTO”) or its operation under an independent coordinator of transmission (“ICT”). Attachment A to each of the May 16, 2013 Stipulations sets forth certain dates for meetings, in particular, with the Staff, and OPC

concerning the content and planning of the benefit-cost studies and the associated 2017 Interim Reports, which were to be filed along with the June 30, 2017 Pleading.

2. On August 22, 2016, the Companies filed a motion to be excused from conducting the benefit-cost studies and filing the 2017 Interim Reports. The Companies argued that their exit fee obligations from SPP,¹ combined with the positive benefit-cost ratios shown by various analyses that had been performed by SPP,² made incurring the cost to perform the benefit-cost studies unwarranted at this time. On September 14, 2016, the Commission in an Order Granting Motion to Relieve KCP&L and GMO of Stipulation Requirements (“September 14, 2016 Order”) approved the Companies’ motion to modify the separate Stipulation and Agreements, relieving the Companies of their obligation to conduct the impending benefit-cost studies and to file the related 2017 Interim Reports. The September 14, 2016 Order did not, however, relieve the Companies of the requirement under the May 16, 2013 Stipulations to file the June 30, 2017 Pleading, which would also address the Companies’ proposals regarding the terms and conditions of future RTO participation beyond September 30, 2018, the end of the 2018 Interim Period.

3. Since the September 14, 2016 Order, the Companies have had further meetings with the Staff and OPC regarding the Companies’ desired proposals concerning the terms and conditions of future RTO participation beyond September 30, 2018. The Companies have indicated a desire that the Commission issue an order providing that the “interim and conditional” approval described in Section II.A(1) of the May 16, 2013 Stipulations be extended until September 30, 2021 and the dates for the associated 2018 Interim Period also be extended for an identical three-year period, to be identified as the 2021 Interim Period. This requested

¹ The exit fee obligation estimates that the Companies provided in the August 22, 2016 motion were in excess of ** [REDACTED] ** total for KCP&L and GMO. The Companies have subsequently received updated exit fee obligation estimates from SPP, which are in excess of ** [REDACTED] ** total for KCP&L and GMO. The Companies have shared these exit fee estimates with Staff and OPC.

² These studies were included as attachments to the Companies’ August 22, 2016 motion.

extension would result in the revised deadlines respecting the Stipulations as outlined on Attachment A to the instant filing. The Companies have noted that such an extension is consistent with the similar extensions recently granted to Union Electric Company, d/b/a Ameren Missouri in Case No. EO-2011-0128 and to The Empire District Electric Company in Case No. EO-2012-0269. The Companies have also noted that under Section II.F(2) of the May 16, 2013 Stipulations, if the Commission does not issue an order to terminate or extend its interim approval prior to 24 months before the end of the existing 2018 Interim Period, the 2018 Interim Period shall automatically be extended under the same terms and conditions from year-to-year (“Extended Interim Period”) unless otherwise ordered by the Commission.

4. The Companies acknowledge that neither the September 14, 2016 Order relieving the Companies of their obligation to conduct the benefit-cost studies and to file the 2017 Interim Reports nor this Joint Motion automatically relieve the Companies of the requirement to conduct benefit-cost studies and to file the 2020 Interim Reports.³ The Companies acknowledge that any potential relief from the requirement to conduct benefit-cost studies and to file the 2020 Interim Reports would require separate future Commission approval.

5. The requested three-year extension, if approved, will result in necessary revisions to the date-related references in Section II of the May 16, 2013 Stipulations. These date-related reference revisions, as described in Attachment B⁴, will result in revisions to the following subsections of Section II of both of the May 16, 2013 Stipulations: II.A(1), II.A(2)(d), II.B(2)(a), II.E(1), II.E(2), II.E(4), II.F(2), II.G(1).

³ There are also provisions for a June 30, 2019 Preliminary Analysis Plan (Section II.E(1)) and a September 30, 2019 finalizing of the Analysis Plan (Section II.E(2)) by the Companies subject to review and consultation with the Staff and OPC.

⁴ There are also several revisions described in Attachment B to correct case number and company reference errors in solely the KCP&L May 16, 2013 Stipulation. These revisions to case number and company related references, which are included in Subsections II.E(1) and II.G(10) of the KCP&L May 16, 2013 Stipulation, are unrelated to the instant extension request. The related references in the GMO May 16, 2013 Stipulation are correct and, thus, do not require revision.

6. The Companies will contact and meet with the Parties should an event(s) or circumstance(s) occur in the SPP footprint that the Companies believe significantly affects the Companies' position within SPP. Also, should a Party believe an event(s) or circumstance(s) has occurred in the SPP footprint that significantly affects the Companies' position within SPP, a Party may request the Companies to convene a meeting to discuss with the Parties whether the extension of the time to file the next case to June 30, 2020 remains reasonable.

7. The Companies and the Parties agree that the requested three-year extension is not detrimental to the public interest. (*See* Section 393.190.1 RSMo. 2016; 4 CSR 240-3.110).

8. Counsel for Southwest Power Pool, Inc. ("SPP") has indicated that SPP does not object to the relief requested in the Joint Motion.

WHEREFORE, the Companies and the Parties request that the Commission issue an order as described above, and in Attachment A and Attachment B, hereto, which would (1) relieve the Companies of their obligations to file Pleadings regarding continued participation in a regional transmission organization or its operation under an independent coordinator of transmission no later than June 30, 2017; (2) extend the "interim and conditional" approval described in Section II.A(1) of the May 16, 2013 Stipulations until September 30, 2021, extend all associated Interim Period dates described in Section II (and subsections of Section II) of the May 16, 2013 Stipulations for an identical three-year period, and (3) designate the 2017 Interim Reports described in Section II of the May 16, 2013 Stipulations as 2020 Interim Reports with attendant activities and dates.

Respectfully submitted,

/s/ Roger W. Steiner

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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 16th day of June, 2017.

/s/ Roger W. Steiner

Roger W. Steiner

ATTACHMENT A
Timeline of the 2021 Interim Period

	<u>Original Schedule</u>	<u>New Date</u>
End of Prior Interim Period: 2013 Interim Period	September 30, 2013	September 30, 2018 (End of 2018 Interim Period)
Scheduled Start of SPP Integrated Marketplace	March 1, 2014	Stays the same
Beginning of Period Subject to Benefit-Cost Study Stipulation and Agreement, Sec. II.E(1)	January 1, 2016	January 1, 2019
Preliminary Analysis Plan Provided to Staff and Public Counsel Stipulation and Agreement, Sec. II.E(1)	June 30, 2016	June 30, 2019
Finalize Analysis Plan after Consultation with Staff and Public Counsel Stipulation and Agreement, Sec. II.E(2)	September 30, 2016	September 30, 2019
2017 Interim Report Deadline Stipulation and Agreement, Sec. II.E(4)	June 30, 2017	June 30, 2020 (2020 Interim Report Deadline)
End of 2018 Interim Period Stipulation and Agreement, Sec. II.A(1), II.E(1), and II.E(4)	September 30, 2018	September 30, 2021 (End of 2021 Interim Period)

Attachment B

KCP&L EO-2012- 0135 Stipulation & Agreement Section	Section Title or Description	Change From:	Change To:
II.	STIPULATIONS		
II.A	INTERIM AND CONDITIONAL APPROVAL OF KCP&L'S PARTICIPATION IN SPP		
II.A(1)	Approval/Term	September 30, 2018 2018 Interim Period 2017 Interim Report	→ → → September 30, 2021 2021 Interim Period 2020 Interim Report
II.A(2)	Approval Provisions		
II.A(2)(a)	Service Agreement Provision		No Changes
II.A(2)(b)	Transmission Costs and Revenues		No Changes
II.A(2)(c)	Continued and Further Participation in SPP		No Changes
II.A(2)(d)	SPP Geographic Scope Provision	2018 Interim Period	→ 2021 Interim Period
II.A(2)(e)	Withdrawal from SPP		No Changes
II.A(2)(f)	Joint Operating Agreements Provision		No Changes
II.B	SERVICE AGREEMENT		
II.B(1)	Purpose of Service Agreement Relationship between the Service Agreement and FERC Determined Incentives		No Changes
II.B(2)	Network Transmission Service under the SPP Open Access Transmission Tariff ("OATT")		No Changes
II.B(2)(a)	SPP Administrative Charges	2018 Interim Period	→ 2021 Interim Period
II.B(2)(b)	Charges Related to SPP Cost Allocation for Base Plan Transmission Upgrades		No Changes

Attachment B

KCP&L EO-2012- 0135 Stipulation & Agreement Section	Section Title or Description	Change From:	Change To:
II.B(2)(c)	Charges Related to SPP Cost Allocation for Economic Balanced Portfolio of Transmission Upgrades	No Changes	
II.B(2)(d)	Cost for Supplemental Upgrades	No Changes	
II.B(2)(e)	Costs and Revenues Related to the Operation of the SPP Power Markets	No Changes	
II.B(2)(f)	Charges for Ancillary Services	No Changes	
II.C	UNANTICIPATED FERC ACTIONS SUBSEQUENT TO APPROVAL BY THE COMMISSION	No Changes	
II.D	TRANSMISSION COSTS AND REVENUES		
II.D(1)	Securitizing KCP&L Transmission Revenues	No Changes	
II.D(2)	Costs and Revenues Related to an Affiliated Transmission Company	No Changes	
II.E	CONTINUED AND FURTHER PARTICIPATION IN SPP		
II.E(1)	Study of Benefits and Costs of RTO Participation	June 30, 2016 September 30, 2018 January 1, 2016 EO-2012-0136	→ → → → June 30, 2019 September 30, 2021 January 1, 2019 EO-2012-0135
II.E(2)	Consultation with other Parties	September 30, 2016 2017 Interim Report	→ → September 30, 2019 2020 Interim Report
II.E(3)	Resolution of Conflicts Regarding the Study	No Changes	

Attachment B

KCP&L EO-2012- 0135 Stipulation & Agreement Section	Section Title or Description	Change From:	Change To:
II.E(4)	Filing with the Commission	June 30, 2017 2017 Interim Report September 30, 2018 2018 Interim Period	➔ June 30, 2020 ➔ 2020 Interim Report ➔ September 30, 2021 ➔ 2021 Interim Period
II.F	WITHDRAWAL FROM SPP		
II.F(1)	Timeliness of Withdrawal from SPP	No Changes	
II.F(2)	Possible Extension of the Interim Period	2018 Interim Period	➔ 2021 Interim Period
II.F(3)	Possible Exit Obligations	No Changes	
II.F(4)	Possible Change in SPP Participation	No Changes	
II.G	EFFECT OF THIS NEGOTIATED SETTLEMENT (Following Subsections II.G(1) – II.G(11) Typically Found In Stipulation and Agreements Filed With The Commission)		
II.G(1)		2017 Interim Report	➔ 2020 Interim Report
II.G(2)		No Changes	
II.G(3)		No Changes	
II.G(4)		No Changes	
II.G(5)		No Changes	
II.G(6)		No Changes	
II.G(7)		No Changes	
II.G(8)		No Changes	
II.G(9)		No Changes	

Attachment B

KCP&L EO-2012- 0135 Stipulation & Agreement Section	Section Title or Description	Change From:	Change To:	
II.G(10)		Any filings and submittals required of KCP&L under the similar stipulation filed in File No. EO-2012-0135 and of KCP&L under this Stipulation may be made jointly.	→	Any filings and submittals required of GMO under the similar stipulation filed in File No. EO-2012-0136 and of KCP&L under this Stipulation may be made jointly.
II.G(11)		No Changes		
II.H	COMMISSION APPROVAL OF THE STIPULATION (Following Subsections II.H(1) – II.H(5) Typically Found In Stipulation and Agreements Filed With The Commission)			
II.H(1)		No Changes		
II.H(2)		No Changes		
II.H(3)		No Changes		
II.H(4)		No Changes		
II.H(5)		No Changes		
II.I	MISCELLANEOUS			
II.I(1)	Counterparts	No Changes		
II.I(2)	Successors and Assigns	No Changes		

Attachment B

KCP&L EO-2012- 0135 Stipulation & Agreement Section	Section Title or Description	Change From:	Change To:
II.I(3)	Section and Subsection Captions		No Changes
II.I(4)	Notices		No Changes