

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

In the Matter of Kansas City Power & Light)
Company’s Notice of Intent to File an)
Application for Authority to Establish a Demand-) File No. EO-2015-0240
Side Programs Investment Mechanism)

In the Matter of KCP&L Greater Missouri Operations)
Company’s Notice of Intent to File an)
Application for Authority to Establish a Demand-) File No. EO-2015-0241
Side Programs Investment Mechanism)

**KANSAS CITY POWER & LIGHT COMPANY’S
AND KCP&L GREATER MISSOURI OPERATIONS COMPANY’S
RESPONSE TO COMMISSION ORDER**

COMES NOW Kansas City Power & Light Company and Greater Missouri Operations (“KCP&L and GMO” or “the Company”) and, for their response to the Missouri Public Service Commission’s (“Commission”) *Order Directing Filing of Staff Recommendation Regarding Revised Technical Resource Manual* (“Order”)¹ issued in these dockets on March 13, 2019, states as follows:

1. The Company has requested that the Commission approve the requested Technical Resource Manual (“TRM”) modifications to be effective on April 1, 2019 to coincide with the next Program Year start date. By having the same date, the EM&V reports won’t require split comparisons for the deemed value (old and new) to actual value, i.e. the Company believes having the same date avoids complications with evaluators and state auditors measure tracking and Net to Gross calculations. It will also aid the Company for other reporting of Throughput Disincentive and cost effectiveness if there is a clean break at Program Year. The Company also wishes to

¹ “The Company has requested that the Commission approve the modifications to the Technical Resource Manual to be effective on April 1, 2019, although the Company has not asked for expedited treatment or explained why that effective date is important.” Order, p. 1.

clarify that it needs both the proposed TRM modifications and the incentive range modifications approved by April 1, 2019 and therefore requests that the Staff review both items in its recommendation. For these reasons, the Company requests expedited approval of the TRM and incentive range modifications.

WHEREFORE, KCP&L and GMO respectfully submits this information to the Commission.

Respectfully submitted,

/s/ Roger W. Steiner

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

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, to all counsel of record in this case on this 14th day of March 2019.

/s/ Roger W. Steiner

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