

**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) Case No. ER-2016-0285
Rate Increase for Electric Service)

**KANSAS CITY POWER & LIGHT COMPANY'S REPLY
TO STAFF'S RESPONSE TO THE COMPANY'S TERMINATION NOTICE**

COMES NOW Kanas City Power & Light Company ("KCP&L") and together with KCP&L Greater Missouri Operations Company ("GMO")(collectively referred to as "Company") files its Reply to Staff's Response To Kansas City Power & Light Company's Termination Notice filed on December 19, 2016, and states as follows:

1. On December 9, 2016, KCP&L filed its Notice of Termination Of Transferring Missouri Customer Calls To Allconnect ("Notice") in which it timely informed the Commission and the parties to this proceeding that it has decided to stop transferring calls from its Missouri customers (including calls from customers of GMO) to Allconnect effective January 1, 2017, and the reasons for its decision. The Notice was filed in this pending KCP&L rate case proceeding since the accounting of revenues and expenses (i.e. above-the-line) related to the Allconnect Program has been a subject of Company and Staff testimony in this case. (See Klote Direct, pp. 30-31; Staff Report--Revenue Requirement Cost of Service, pp. 142-43).

2. On December 19, 2016, Staff filed its *Response To Kansas City Power & Light Company's Termination Notice* ("Staff Response"). Staff provided the Commission with an explanation of its actions to monitor and assess the Company's efforts to comply with the Commission's *Order Regarding Script Revisions* ("Order") issued in Case No. EC-2015-0309 on May 26, 2016. The Company would like to express its appreciation to Staff for its thoughtful, objective and constructive response to the Company's Notice.

3. On pages 10-11 of the *Staff Response*, Staff posed four (4) questions to the Company related to its analysis of how to assess the performance of its customer representatives related to the Allconnect Program and compliance with the Commission's May 26, 2016 *Order*.

4. In response, the Company would suggest that compliance be assessed in a manner different than that posited by Staff in Situations A, B and C and Overall Compliance on pp. 10-11 of *Staff's Response*. Instead, the Company believes that compliance with the Commission's May 26 *Order* is better judged by determining whether processes and procedures have been put in place that are reasonably designed to obtain informed consent of the customer before a call and customer information are transferred to Allconnect. Questions relevant to that assessment include:

- a. Has the Company provided training to customer service representatives that is designed to obtain reasonable adherence to the script as well as informed consent prior to transfer?
- b. Has the Company provided guidance to supervisors so that they know how to assess customer service representative performance in this area?
 - c. Does the Company monitor and assess performance in this area?
 - d. Does the Company coach and counsel employees when performance in this area is observed to fall short of expectations (i.e., reasonable adherence to the script as well as informed consent prior to transfer)?
- 5. Although the percentage of completed calls deemed compliant is relevant to assessing whether processes and procedures have been put in place that are reasonably designed to obtain informed consent of the customer before the call and customer information are

transferred, the Company does not have an opinion at this time as to whether a specific percentage of compliant completed calls should qualify the entire program as compliant.

WHEREFORE, KCP&L respectfully submits its Reply to the Staff Response filed on December 19, 2016.

Respectfully submitted,

/s/ Robert J. Hack

Robert J. Hack, MBN 36496
Roger W. Steiner, MBN 39586
Kansas City Power & Light Company
1200 Main Street, 19th Floor
Kansas City, MO 64105
Telephone: (816) 556-2314
Facsimile: (816) 556-2110
E-Mail: Rob.Hack@kcpl.com
E-Mail: Roger.Steiner@kcpl.com

Attorneys for
Kansas City Power & Light 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 22nd day of December, 2016.

/s/ Robert J. Hack

Robert J. Hack