

1. As noted in prior comments offered in the working case associated with this proposed rulemaking (AW-2014-0329), the Company believes authorized pay stations are a valuable customer service bill-payment option for certain customers. The Company utilizes a third party to contract and retain utility pay stations/agents to provide geographical coverage; maintain an environment and business standard that reflects positively on KCP&L; and most importantly provides this needed customer service option for customers. Historically, KCP&L has utilized short-term lenders as authorized pay stations in a limited fashion, mainly when other options cannot be found. As authorized pay stations are engaged via contract, the Company has placed certain requirements on all its pay station agents to ensure customers are not placed at any disadvantage. Pay station agents are not permitted to require a “store purchase” for KCP&L customers to make a payment. The Company has specific language included in its pay station contract that the number of payday loan and check cashing locations shall be limited and has the right to refuse any proposed agent. Concerning bill payment activity, no predatory behavior on the part of the short-term lenders has ever been reported to KCP&L and KCP&L has no knowledge of any written or verbal customer complaint specific to the check cashing services and/or payday loan services provided at authorized pay stations.

2. KCP&L believes the proposed rule concerning the use of short-term lenders will not address the concerns many of the parties expressed during the working case. The proposed rule language does not appropriately address the mechanics of pay stations and exposes the utilities to uncertainty and risk of non-compliance. Additionally, the proposed rule creates a new burden of enforcement on the Commission and utilities; a burden requiring oversight of a pay agent's business practices, beyond the contracted function of accepting payments.

3. However, the Company understands the issues raised and is sympathetic to the concerns. As a result of the working case, the Company reviewed its limited use of short-term lenders as authorized pay stations and either closed them or found alternative sites.

WHEREFORE, the Company submits its comments in response to the Commission's proposed rulemaking.

Respectfully submitted,

/s/ Roger W. Steiner

Robert J. Hack, MBN 36496

Lead Regulatory Counsel

Phone: (816) 556-2791

E-mail: rob.hack@kcpl.com

Roger W. Steiner, MBN 39586

Corporate Counsel

Phone: (816) 556-2314

E-mail: roger.steiner@kcpl.com

Kansas City Power & Light Company

1200 Main – 16th Floor

Kansas City, Missouri 64105

Fax: (816) 556-2787

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 parties of record this 31st day of March, 2016.

/s/ Roger W. Steiner

Roger W. Steiner