

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

In the Matter of a Working Docket to Review)
Electric Vehicle Charging Stations) File No. EW-2015-

MOTION TO OPEN WORKING DOCKET

COME NOW Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively “the Company”), by and through the undersigned counsel, and files this Motion to Open a Working Docket with the Missouri Public Service Commission (“Commission”) stating the following:

1. Pursuant to 386.250 RSMo, the Commission’s jurisdiction extends to the manufacture, sale or distribution of electricity for light, heat and power within the state.
2. On January 26, 2015, KCP&L announced its planned Clean Charge Network for the installation and operation of more than 1,000 electric vehicle charging stations capable of supporting more than 10,000 electric vehicles. (See News Release, Support of KCP&L’s Clean Charge Network and Kansas City Star editorial attached hereto as Appendix 1).
3. The Company recommends the Commission establish a working docket so that interested stakeholders can learn more about KCP&L’s Clean Charge Network¹ and collaboratively discuss issues attendant to even broader penetration of electric vehicles and electric vehicle charging stations, including but not limited to:
 - a. Impact of charging stations on a utility’s retail customers;
 - b. Impact of charging stations on a utility’s distribution system;
 - c. Pricing alternatives and other impacts of electric vehicles; and
 - d. Any other issue regarding electric vehicle charging stations.
4. The Commission’s establishment of a working docket will assist all stakeholders,

¹ While the Company has requested recovery of certain costs related to the Clean Charge Network in KCP&L’s ongoing rate case (Case No. ER-2014-0370), it envisions the rate case to focus primarily on revenue requirement impacts of the Clean Charge Network during a pilot period, while this working docket would consider broader and longer range policy issues related to electric vehicles and charging stations.

including the Commission, in learning about future issues involved with electric vehicle charging stations. A docket will also provide transparency and will allow any person with an interest in this matter to view documents and submit comments. At the first scheduled session of the working docket, the Company would anticipate making a presentation regarding its Clean Charge Network and facilitating a discussion among stakeholders of issues and concerns related to electric vehicles, charging stations and providers of electric utility service with the goal of structuring future working docket sessions that will be useful to stakeholders.

5. The Company recommends the Commission provide notice of its establishment of a working docket in this matter to: the parties and intervenors in dockets initiated by the Company²; the Office of the Public Counsel; other Commission-certified electric corporations, and others as determined by the Commission.

WHEREFORE, the Company moves for the Commission to establish a working docket for the purposes described above, and recommends the Commission provide notice of the docket to the entities listed in paragraph (5) above along with any other person the Commission deems appropriate.

Respectfully submitted,

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**ATTORNEYS FOR KANSAS CITY POWER &
LIGHT COMPANY AND KCP&L GREATER
MISSOURI OPERATIONS COMPANY**

² EO-2012-0009; EO-2014-0159; EO-2014-0189; ER-2014-0370; ER-2014-0373; ER-2015-0153; ER-2015-0154; ET-2014-0277; ET-2015-0161; EU-2014-0077; EU-2014-0255.

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 the certified service list in this proceeding this 5th day of February, 2015.

Roger W. Steiner

Roger W. Steiner

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FOR IMMEDIATE RELEASE

KCP&L BECOMES ELECTRIC VEHICLE INFRASTRUCTURE LEADER WITH GROUNDBREAKING ANNOUNCEMENT

KCP&L's Clean Charge Network will be the largest utility electric vehicle charging station installation in the country

KANSAS CITY, Mo. (Jan. 26, 2015) — Today, at a kickoff event at its headquarters, Kansas City Power & Light Company (KCP&L), a subsidiary of Great Plains Energy Incorporated (NYSE: GXP), announced its plans to install and operate more than 1,000 electric vehicle charging stations, making it the largest electric vehicle charging station installation by an electric utility in the United States. KCP&L's Clean Charge Network is the next step in the company's leadership in environmental sustainability. Over the next several months, KCP&L will install more than 1,000 charging stations throughout the Greater Kansas City region. This network of stations will be capable of supporting more than 10,000 electric vehicles. Through partnerships with companies at host locations and with Nissan Motor Company, the Clean Charge Network will offer free charging on every station to all drivers for the first two years. The stations are manufactured by ChargePoint and will be part of the ChargePoint network of more than 20,000 charging spots in North America.

"The Kansas City region is quickly building a reputation as an innovative, sustainable place to live and work," said Terry Bassham, President and CEO of Great Plains Energy and KCP&L. "We're excited to continue being a leader in support of this growth by providing our customers and visitors to this region with an environmentally-friendly alternative to gasoline-powered vehicles. Thanks to our Clean Charge Network, everyone in our service territory will be able to charge up and hit the road."

Where can I charge my electric vehicle?

The charging stations will be installed strategically throughout KCP&L's service region, ensuring there will be a charging station near where electric vehicle owners live and work.

"We are committed to the electric vehicle industry and want to give residents and visitors the ability to join the electric vehicle revolution. As a utility, we will place the stations where they're needed most and support them as part of our electric grid, leveraging our expertise with

electrical infrastructure,” said Bassham. “Our Clean Charge Network eliminates ‘range anxiety’ in the region, which is the number one roadblock to greater electric vehicle adoption. Now, electric vehicle owners will have an answer to the question, ‘Where do I recharge my vehicle?’”

Installation of the charging stations began in late 2014 and will be completed this summer. The first stations deployed on the network will include 15 fast charging stations provided by Nissan and KCP&L, which will charge any model of electric vehicle on the market. On the fast charging stations, an electric vehicle like the Nissan LEAF will charge from empty to approximately 80 percent in about 30 minutes. In addition, the Clean Charge Network will have more than 1,000 standard charging stations, which will give most electric vehicles a 25 mile charge for every hour it is plugged into the station.

“The number of stations allows electric vehicle owners to change their habits, charging as they go about their day, and giving them the freedom to drive that much further. It makes it easier for current electric vehicle owners and hopefully will remove the perceived barriers for potential electric vehicle owners,” said Bassham.

What's in it for me?

“The most exciting part is that everyone benefits,” said Kansas City Mayor, Sly James. “Not only do the owners of electric vehicles in Kansas City benefit, but with this project, KCP&L is also investing in the economic development and environmental sustainability of this region, which is a win for everyone. I applaud KCP&L for taking this groundbreaking step forward right here in Kansas City.”

Kansas City is the largest auto manufacturing center in the United States, outside of Detroit. That position makes the region well suited for leadership in the transportation of the future. Range anxiety — the fear of running out of power before reaching the next charging station — is a top concern for potential electric car buyers. By alleviating that anxiety and enabling more people to purchase electric vehicles, KCP&L’s Clean Charge Network continues Kansas City region’s leadership as an automotive center by creating new jobs and, ultimately, attracting new businesses and talent.

This project extends KCP&L’s position as an industry leader in environmental sustainability. Along with KCP&L’s environmental upgrades at several local power plants, renewable energy portfolio and its energy efficiency programs, the KCP&L Clean Charge Network will reduce carbon emissions and help the Kansas City region attain EPA regional ozone standards.

“All our environmental investments, including the new network, advance our commitment to a more sustainable energy future,” said Bassham. “We know our customers want more choice when it comes to their energy solutions, and we are committed to providing them with affordable, long-term energy solutions that offer them greater control of their energy use.”

In addition to regional economic and environmental benefits, the Clean Charge Network can help keep electricity costs low for all KCP&L customers. As more drivers adopt electric vehicles, not only will vehicle emissions be reduced but the cost of operating and maintaining the electrical grid will be spread over increased electricity usage, benefitting everyone. Those who drive electric vehicles will see the bill for fueling their cars go down because electricity is less expensive than gasoline, even at gasoline’s low current price. At the same time, increased efficient use of electricity will offset cost increases for operating the grid, which would otherwise become part of customer bills.

“People generally charge their cars at non-peak periods when KCP&L’s electrical grid is being underutilized. By stimulating electric vehicle adoption with their Clean Charge Network, what KCP&L is doing is encouraging people to use the electrical grid more efficiently and drive down the cost of electricity for everyone,” said Natural Resources Defense Council Senior Energy Economist Ashok Gupta. “KCP&L’s efforts to encourage the use of electric vehicles, modernize the electrical grid, increase the use of renewable energy sources and invest in customers through robust energy efficiency programs are all critical parts of a sustainable energy future. More electric vehicles on the road means that people will be using more electricity during times when KCP&L already has enough generation and distribution capacity to meet their demand. That means savings on electricity bills for everyone and cleaner air for everyone.”

Why KCP&L?

KCP&L is not new to electric vehicle infrastructure. In 2011, KCP&L worked with the Kansas City Regional Clean Cities Coalition to bring ten charging stations to the area. KCP&L also deployed additional stations through the KCP&L SmartGrid Demonstration Project. All of these stations offered the opportunity to test technologies and behaviors while monitoring usage, laying the foundation for KCP&L’s Clean Charge Network.

“We’ve learned a lot over the last few years about how our customers use electric vehicles,” said Bassham. “Combined with our knowledge of the electric grid and award-winning reliability, we think we’re well-suited to operate the electric vehicle network.”

KCP&L will install ChargePoint stations as part of this project. ChargePoint operates the world’s largest electric vehicle charging network, making Clean Charge stations part of a nationwide cohesive network and not a series of one-off stations. As a result, electric vehicle owners in this region will have the same experience, the same customer service and a set of transparent and standard pricing options at every station. And for the next two years, charging a car in KCP&L’s Clean Charge Network will be free to electric vehicle owners. KCP&L is partnering with Nissan and the host sites to cover the charging cost to further encourage electric vehicle adoption in this market.

Economies of scale with KCP&L’s Clean Charge Network will help keep costs low. As a utility, KCP&L’s costs are regulated by state commissions. These factors combine to ensure a fair price for the stations. The commissions will also help facilitate conversations to ensure all stakeholders have a voice.

Partners

“Our partners helped make this groundbreaking program a reality,” said Bassham. “Each is a leader in the electric vehicle industry worldwide. We look forward to working together on making the Midwest a leader in the electric vehicle industry.”

- **Nissan**, maker of the Nissan LEAF, the best-selling all-electric car, is providing funding toward 16 fast charging stations, including covering the costs of the electricity necessary to power the charging stations for two years.
- **ChargePoint**, the world’s largest and most open electric vehicle charging network, will manufacture the standard charging stations in KCP&L’s Clean Charge Network. ChargePoint manufactures the stations and this represents the single largest single

installation on the ChargePoint network. ChargePoint provides 24/7 driver support and offers a free mobile app that drivers can use to find stations and start charging.

KCP&L is also partnering with local companies to be host sites for the Clean Charge Network. Host sites have been selected using a variety of criteria, including ensuring KCP&L's Clean Charge Network is accessible at geographically diverse sites that are convenient for customers to access. There are still a limited number of spots available for sites. Interested business can apply online at www.kcpl.com/CleanCharge. Customers who would like to nominate a location can do so on KCP&L's Facebook page at www.facebook.com/KCPLConnect.

How to access the Clean Charge Network

To utilize the stations, all drivers have to do is sign up for a ChargePoint membership (<https://na.chargepoint.com/register>). Drivers will then have access to the more than 20,000 charging locations nationwide on the ChargePoint network, including these new stations offered by KCP&L. Drivers can find charging stations and see their availability in real-time at ChargePoint.com or with the free ChargePoint mobile app. To use the stations, drivers simply wave their ChargePoint card in front of the station, or use the ChargePoint mobile app.

For more information on this project and to see a map of locations already selected, please visit www.kcpl.com/CleanCharge.

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About Great Plains Energy:

Headquartered in Kansas City, Mo., Great Plains Energy Incorporated (NYSE: GXP) is the holding company of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company, two of the leading regulated providers of electricity in the Midwest. Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company use KCP&L as a brand name. More information about the companies is available on the Internet at: www.greatplainsenergy.com or www.kcpl.com.

About Nissan LEAF:

With more than 158,000 global sales since launch, Nissan LEAF is the world's best-selling electric vehicle. LEAF seats up to five passengers and boasts an estimated driving range on a fully-charged battery of 84 miles and MPGe ratings of 126 city, 101 highway and 114 combined. The effective price of a Nissan LEAF starts at about \$23,000 after the available \$7,500 federal tax credit, which is competitive with gas-powered cars while providing the benefits of lower running costs and less scheduled maintenance. For more information, visit www.nissanusa.com/LEAF.

About ChargePoint:

ChargePoint operates the world's largest electric vehicle (EV) charging network, with more than 20,000 spots to plug in and charge. We are transforming the transportation industry by providing the charging stations, mobile apps, analytics and the charging network that allow property owners and drivers to benefit from EV charging. We are also transforming the energy industry by providing intelligent solutions to help people and businesses shift away from fossil fuels and use electricity more efficiently. Our mission is to get all drivers behind the wheel of an EV and

provide them a place to charge whether at home, at work, around town or out-of-town. Real-time network information is available through the ChargePoint app and in many top-selling EVs. For more information, visit www.chargepoint.com

Forward-Looking Statements:

Statements made in this release that are not based on historical facts are forward-looking, may involve risks and uncertainties, and are intended to be as of the date when made. Forward-looking statements include, but are not limited to, the outcome of regulatory proceedings, cost estimates of capital projects and other matters affecting future operations. In connection with the safe harbor provisions of the Private Securities Litigation Reform Act of 1995, Great Plains Energy and KCP&L are providing a number of important factors that could cause actual results to differ materially from the provided forward-looking information. These important factors include: future economic conditions in regional, national and international markets and their effects on sales, prices and costs; prices and availability of electricity in regional and national wholesale markets; market perception of the energy industry, Great Plains Energy and KCP&L; changes in business strategy, operations or development plans; the outcome of contract negotiations for goods and services; effects of current or proposed state and federal legislative and regulatory actions or developments, including, but not limited to, deregulation, re-regulation and restructuring of the electric utility industry; decisions of regulators regarding rates the Companies can charge for electricity; adverse changes in applicable laws, regulations, rules, principles or practices governing tax, accounting and environmental matters including, but not limited to, air and water quality; financial market conditions and performance including, but not limited to, changes in interest rates and credit spreads and in availability and cost of capital and the effects on nuclear decommissioning trust and pension plan assets and costs; impairments of long-lived assets or goodwill; credit ratings; inflation rates; effectiveness of risk management policies and procedures and the ability of counterparties to satisfy their contractual commitments; impact of terrorist acts, including but not limited to cyber terrorism; ability to carry out marketing and sales plans; weather conditions including, but not limited to, weather-related damage and their effects on sales, prices and costs; cost, availability, quality and deliverability of fuel; the inherent uncertainties in estimating the effects of weather, economic conditions and other factors on customer consumption and financial results; ability to achieve generation goals and the occurrence and duration of planned and unplanned generation outages; delays in the anticipated in-service dates and cost increases of generation, transmission, distribution or other projects; Great Plains Energy's ability to successfully manage transmission joint venture; the inherent risks associated with the ownership and operation of a nuclear facility including, but not limited to, environmental, health, safety, regulatory and financial risks; workforce risks, including, but not limited to, increased costs of retirement, health care and other benefits; and other risks and uncertainties.

This list of factors is not all-inclusive because it is not possible to predict all factors. Other risk factors are detailed from time to time in Great Plains Energy's and KCP&L's quarterly reports on Form 10-Q and annual report on Form 10-K filed with the Securities and Exchange Commission. Each forward-looking statement speaks only as of the date of the particular statement. Great Plains Energy and KCP&L undertake no obligation to publicly update or revise any forward-looking statement, whether as a result of new information, future events or otherwise.

Governor Jay Nixon, Governor of Missouri

“Today’s announcement is another great example of how Missouri continues to lead the way toward a more sustainable energy future from right here in the heartland,” said Gov. Nixon. “The Clean Charge Network will help cement Kansas City’s position as a center of next-generation automotive technology and innovation, while benefiting drivers and communities alike.”

Governor Sam Brownback, Governor of Kansas

“This program is an example of the strong partnerships that improve our communities and benefit our citizens,” said Governor Brownback. “I congratulate KCP&L and their community partners on this effort that will help make our region more attractive to businesses.”

Missouri Department of Energy Endorses the KCP&L Clean Charge Network**Tesla Motors****James C. Chen, Vice President of Regulatory Affairs & Associate General Counsel**

Tesla congratulates Kansas City Power & Light on its announcement today to establish the Clean Charge Network. Tesla’s mission is to catalyze the world’s transition to electric vehicles and the bold steps taken by KCP&L help further this innovative and uniquely American solution to our transportation needs.

The proliferation of the Clean Charge Network charging stations will provide additional convenience and assurance for EV customers answering the question of where they can charge. These charging stations will encourage domestic production and distribution of electricity, which strengthens state and federal economies and diversifies our greater energy portfolio.

Tesla is proud to participate in this announcement and support KCP&L in its endeavors. Efforts by leaders in industry such as KCP&L will help more consumers learn about the benefits and advantages of driving electric.

Electric Research Power Institute**Dan Bowermaster, Program Manager of Electric Transportation**

“This project is the first integrated regional approach to providing plug-in electric vehicle infrastructure in the country,” said Dan Bowermaster, program manager of Electric Transportation at the Electric Power Research Institute (EPRI). “Research shows that a coordinated regional deployment of infrastructure is critical to supporting the widespread adoption of electric vehicles. By pursuing this coordinated approach, KCP&L is able to minimize costs and impacts to the power system.”

Kansas City Area Development Council**Bob Marcusse, President and CEO**

Today’s announcement accelerates our region’s ability to attract a new generation of tech-savvy, educated and skilled professionals. It also marks a key milestone in shedding the outdated image some still have of KC, and will provide a significant boost to our region’s competitiveness. It will especially have a transformational impact on our ability to attract companies looking to hire a new generation workforce.

While on the surface this is about a new technology, in reality it is about the resurgence of Kansas City. It is a very big statement that the old days of "aw shucks" are only glimpsed in the rear view mirror.

I am especially eager to start sharing this new lifestyle asset with the corporate decision makers that are evaluating our region as a location where they will invest in their company's future.

KCP&L is truly breaking new ground with the launch of the Clean Charge Network in KC. This innovative endeavor provides a unique lifestyle advantage for KC residents today and into the future.

Ford Motor Company

Mike Tinskey, Global Director, Vehicle Electrification & Infrastructure

"We are pleased to see Kansas City Power & Light taking great steps to help drivers charge their plug-in vehicles," said Mike Tinskey, Ford Motor Company's global director, Vehicle Electrification & Infrastructure. "Ford customers drive over a half of a million miles a day on electricity, and we are fully supportive of any efforts to increase the number of all-electric miles and find innovative ways to maximize the number that are carbon-free."

Nissan

Brendan Jones, Director, EV Sales and Infrastructure Deployment

As the leader in electric vehicle sales with LEAF, Nissan is investing to install chargers across the country to support EV owners and to encourage further adoption," said Brendan Jones, director of EV Sales and Infrastructure Deployment. "We applaud KCP&L's commitment to provide EV charging, and we look forward to working to serve our shared customers - Nissan LEAF drivers in Kansas City.

General Motors

Britta Gross, Director for Advanced Vehicle Commercialization Policy

"We applaud the leadership being shown by KCP&L when it comes to deploying EV charging infrastructure in the Midwest," said Britta Gross, General Motors' director for advanced vehicle commercialization policy. "This program will help accelerate the adoption of electric vehicles, like the Chevrolet Volt, which has developed a strong and enthusiastic fan-base. KCP&L is on the forefront when it comes to helping expand the electric vehicle market and we look forward to working together to keep this positive momentum going."

Mid-America Regional Council

David Warm, Executive Director

The Mid-America Regional Council (MARC) applauds the efforts of KCP&L as a regional leader in sustainable initiatives such as the Clean Charge Network. These infrastructure improvements encourage the use of electric vehicles, which can help reduce the impact of tailpipe emissions on our local air quality as we strive to maintain compliance with federal standards. Our region benefits in many ways from having forward-thinking and community-minded utility providers - we look forward to continued progress toward a cleaner and healthier Kansas City.

Greater Kansas City Chamber of Commerce

Jim Heeter, CEO

"With this announcement, KCP&L has just removed a huge impediment for anyone considering the purchase of an electric vehicle. This is a big deal and the new charging station network will immediately identify Kansas City as a leader in innovation and sustainability. KCP&L and its CEO Terry Bassham deserve both congratulations and applause."

Sierra Club

Jim Turner, Chair of the Missouri Chapter

"The Sierra Club is very pleased to see KCP&L make such a significant investment in electric vehicle infrastructure," said Jim Turner, Chair of the Missouri Chapter of the Sierra Club. "Plug-in vehicles are much cleaner for our air and our climate than conventional vehicles, and electric cars will become even cleaner over time as KCP&L continues the shift to more renewable sources of power."

Future of electric cars bodes well for the Kansas City area

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The plan to install more than 1,000 public electric charging stations in the Kansas City area is excellent news for current and future drivers of electric cars. They will have a lot more places to plug in and fuel up.

A quick sidenote: In these highly partisan times, it's not every project that can get a hearty thumbs-up from Democratic Gov. Jay Nixon ("another great example of how Missouri continues to lead the way toward a more sustainable energy future") and Kansas Republican Gov. Sam Brownback ("an example of the strong partnerships that improve our communities").

But it's the larger picture that carries the potential of long-term rewards for the local economy and the environment. This is where Kansas City Power & Light leaders, elected officials and others need to focus their attention as the project rolls out.

KCP&L already has sketched out a sensible "Clean Charge Network" scheme that is placing many of the facilities in downtown Kansas City, in Johnson County and north of the Missouri River, and in surrounding communities such as St. Joseph and Warrensburg. The utility is still seeking other sites in the region.

Related If the charging stations are convenient to electric car drivers, who worry about whether their battery power will last until they get to their destination, then more buyers likely will come along for the vehicles.

The increased use of clean-burning electric vehicles also is better than dealing with the harmful tail-pipe emissions from gasoline-powered cars and trucks.

KCP&L already is spending millions of dollars to clean up emissions from its coal-burning power plants. The utility, to its credit, is also investing in cleaner, renewable wind energy, while it recently announced plans to close or retrofit three smaller coal-fired plants.

All of these moves will help the utility produce power in cleaner ways, which will make charging electric cars even less of a burden on the environment.

That positive result is partly why the utility says it's appropriate to dun ratepayers an estimated \$1 to \$2 a year for the public electric chargers.

In addition, KCP&L says the increased use of electric cars will spread the burden of paying for its grid to more people, making it more efficient to operate, while also drawing extra revenue from the power sold to owners of electric vehicles.

This project makes sense, even with the plummeting price of gasoline. One expert estimated 70 cents of electricity is equivalent to gasoline sold at \$1.75 a gallon.

Finally, installing the charging stations also will bump up Kansas City's image among millennials and others interested in coming to regions that are open to smart, progressive thinking on environmental and utility issues.

KCP&L is betting that this system could be successful and thus worth expanding. Already, the addition of more than 1,000 public charging stations will enable the Kansas City region to have more than every state except California.

That's a significant accomplishment. This is a venture worth rooting for, given its potential to reduce pollution and make Kansas City a more attractive place to live.

Related

Read more here: <http://www.kansascity.com/opinion/editorials/article8837450.html#storylink=cpy>