

when determining whether an asset is over or under-utilized, a full contingency analysis must be completed and is often the determining factor as to the availability of the particular asset. As such, KCP&L’s Distribution Planning team suggests that asset utilization be evaluated based on the worst (most highly loaded) contingency scenario for the asset(s) in question.

- c. Based on its proposed criteria or definitions of underutilized infrastructure, designate geographically or by equipment underutilized infrastructure. (May contain highly confidential or critical system information.)*

RESPONSE: For the purpose of this exercise, KCP&L suggests a $\geq 50\%$ loading threshold for the worst contingency scenario for identifying assets as underutilized. It is also worth noting that these evaluations are merely a snapshot in time, and are subject to change based on load additions due to new customers or development proposals.

The following is a list of transformers/circuits in the KCP&L/GMO Missouri service area where there is at least 50% of rated capacity available under normal AND contingency scenarios:

KCP&L ID	DISTRICT	SUBSTATION NAME	ASSET TYPE
39151	St. Joe	Edmond Street	Distribution Circuit
39162	St. Joe	Edmond Street	Distribution Circuit
40781	Maryville	Maryville	Distribution Circuit
23813	Platte City	Ferrelview	Distribution Circuit
23823	Platte City	Ferrelview	Distribution Circuit
7552	Dodson	Midtown	Distribution Circuit
3514	Dodson	Loma Vista	Distribution Circuit
3734	F&M	Terrace	Distribution Circuit
2423	F&M	Crosstown	Distribution Circuit
31112	Blue Springs	Oak Grove	Distribution Circuit
2822	East District	Sweet Springs	Distribution Circuit
311T2	Blue Springs	Oak Grove	Substation Transformer
25T1	East District	Glasgow	Substation Transformer

25T2	East District	Glasgow	Substation Transformer
28T1	East District	Sweet Springs	Substation Transformer
28T2	East District	Sweet Springs	Substation Transformer

2. Please respond to discussion points by Chairman Hall regarding:

- a. Bifurcated line extension tariffs between service provided in areas with preexisting excess capacity and areas requiring additional infrastructure development, and;*

RESPONSE: Please see KCP&L/GMO filing of November 30, 2015.

- b. Providing incentives, without utility discretion and based on customer eligibility criteria, comparable to those in existing Urban Core Development and Economic Redevelopment Riders to new customers entering applicable designated area. (Staff would also appreciate any discussion of applicable definitions for new customers in this context.)*

RESPONSE: Please see KCP&L/GMO filing of November 30, 2015.

Conclusion

The Company respectfully requests that the Commission consider the foregoing comments.

Respectfully submitted

/s/ Robert J. Hack

Robert J. Hack, MBN 36496

Phone: (816) 556-2791

E-mail: rob.hack@kcpl.com

Roger W. Steiner, MBN 39586

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

James M. Fischer, MBN 27543
Phone : (573) 636-6758 ext. 1
E-mail : jfischerpc@aol.com
Fischer & Dority, P.C.
101 Madison—Suite 400
Jefferson City, Missouri 65101
Fax : (573) 636-0383

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

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