## **BEFORE THE PUBLIC SERVICE COMMISSION**

## **OF THE STATE OF MISSOURI**

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In The Matter of the Application of Kansas City Power & Light Company for Permission and Approval and a Certificate of Convenience and Necessity to Construct, Install, Own, Operate, Maintain, and Otherwise Control and Manage an Electric Utility System to Provide Electric Service in Johnson and Pettis Counties, Missouri as an Expansion of its Existing Certificated Area

EA-2018-\_\_\_\_

# KANSAS CITY POWER & LIGHT COMPANY'S APPLICATION FOR CERTIFICATE OF CONVENIENCE AND NECESSITY

Kansas City Power & Light Company ("KCP&L" or "Company") pursuant to Sections 393.170 and 393.171, Mo. Rev. Stat.,<sup>1</sup> as well as 4 CSR 240-2.060 and 4 CSR 240-3.105, requests permission and approval and a certificate of convenience and necessity ("CCN") to construct, install, own, operate, maintain and otherwise control and manage an electric utility system to provide electric service in Johnson and Pettis County Missouri as a further expansion of its existing certificated area. In support of this Application, KCP&L states:

1. KCP&L is a Missouri corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. KCP&L is primarily engaged in the generation, transmission, distribution, and sale of electricity in western Missouri and eastern Kansas, operating primarily in the Kansas City metropolitan area. KCP&L is an "electrical corporation" and "public utility" under Section 386.020 (15) and (43) and is subject to the jurisdiction, supervision and control of the Commission under Chapters 386 and 393. KCP&L provided its Certificate of Good Standing in Case No. EF-2017-0242 which is incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G).

<sup>&</sup>lt;sup>1</sup> All statutory references are to the Missouri Revised Statutes (2000), as amended, unless otherwise indicated.

2. Applicant has no pending actions against it from any state or federal agency or court that involves customer service or rates, which has occurred within three years of the date of this Application. No annual report or assessment fees are overdue.

3. Pleadings, notices, orders and other correspondence and communications concerning this Application should be addressed to the undersigned counsel and:

Lois Liechti Director, Regulatory Affairs Kansas City Power & Light Company 1200 Main Street Kansas City, Missouri 64105 Phone: (816) 556-2612 Fax: (816) 556-2110 E-mail:lois.liechti@kcpl.com

Anthony Westenkirchner Senior Paralegal, Regulatory Affairs Kansas City Power & Light Company 1200 Main Street Kansas City, Missouri 64105 Phone: (816) 556-2668 Fax: (816) 556-2110 E-mail: anthony.westenkirchner@kcpl.com

Nicole Wehry Senior Communications Specialist, Regulatory Affairs Kansas City Power & Light Company 1200 Main Street Kansas City, Missouri 64105 Phone: (816) 556-2077 Fax: (816) 556-2110 E-mail:nicole.wehry@kcpl.com

4. Data requests concerning this Application should be addressed to Regulatory.Affairs@kcpl.com.

5. KCP&L seeks a CCN for electric service for the areas described in **Appendix A**. The proposed service areas are shown as red blocks on the maps attached hereto as **Appendix B**. KCP&L holds a CCN for electric service for the areas adjoining the service areas being requested in this Application.

6. In the areas for which KCP&L is seeking to be certified by this Application, the electric system has already been constructed and is in operation.

7. There are ten or more residents or landowners in the area, and, as such, pursuant to 4 CSR 240-2.105(1)(A)(2), a listing of the names and addresses of ten or more residents or landowners is attached hereto as **Appendix C-HC**. This appendix is identified as Highly Confidential because it contains information relating directly to specific customers. This request, to the best of the Company's knowledge, covers all customers affected.

8. In order to supply electric service to the described areas, KCP&L will not need to install any new facilities and will not need to engage in any construction nor require any new financing. As such KCP&L has not created a feasibility study containing plans and specifications and the estimated costs for construction and there are no plans for financing.

9 KCP&L holds a franchise agreement with Pettis county and believes no permits from the counties are required to serve the areas.

10. The rates for the proposed sections will be those currently approved and in effect for services provided in KCP&L adjacent certified territory under KCP&L's currently existing tariff. A copy of the proposed tariffs that will include the requested service territory is attached as **Appendix D**. KCP&L plans to use the general terms and conditions of service found in KCP&L's currently approved tariffs.

11. KCP&L has not filed a 60-day notice pursuant to 4 CSR 240-4.020(2) and pursuant to 4 CSR 240-4.020(2)(B) requests a waiver of this requirement. Although 393.170 RSMo. requires a hearing, or the opportunity for a hearing, before a CCN is granted, KCP&L

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does not anticipate this proceeding being contested in that sense. With regard to the 60-day period prior to the filing of this Application, KCP&L represents to the Commission that it did not engage in any conduct which would have constituted a violation of any ex parte rule or standard of conduct if the notice had been filed pursuant to 4 CSR 240-4.020(2).

12. The CCN will allow KCP&L to serve its existing customers that are currently located outside of its service territory. For this reason, the CCN will further the public convenience and necessity.

WHEREFORE, KCP&L respectfully requests that the Commission approve this Application and issue a CCN to KCP&L as set forth above. KCP&L requests such other and further relief as is just and proper under the circumstances.

Respectfully submitted,

# [s] Roger W. Steiner

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 – 19<sup>th</sup> Floor Kansas City, Missouri 64105 Fax: (816) 556-2110

Counsel for Kansas City Power & Light Company

## **CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first class United States Mail, postage pre-paid, to the service list of record this 20<sup>th</sup> day of July, 2017.

General Counsel's Office Missouri Public Service Commission P.O. Box 360 200 Madison Street, Suite 800 Jefferson City, MO 65102 staffcounselservice@psc.mo.gov Office of the Public Counsel P.O. Box 2230 200 Madison Street, Suite 650 Jefferson City, MO 65102-2230 opcservice@ded.mo.gov

|s| Roger W. Steiner

Roger W. Steiner

## AFFIDAVIT

State of Missouri ) ) ss County of Jackson )

I, Lois Liechti, having been duly sworn upon my oath, state that I am the Director of Regulatory Affairs of Kansas City Power & Light Company ("KCP&L"), that I am duly authorized to make this affidavit on behalf of the Applicant, and that the matters and things stated in the foregoing pleading are true and correct to the best of my information, knowledge and belief.

Lois Liechti

Subscribed and sworn before me this Zoth day of July, 2017.

NOTARY PUBLIC

ANTHONY R WESTENKIRCHNER Notary Public, Notary Seal State of Missouri Platte County Commission # 17279952 My Commission Expires April 26, 2021

KCP&L seeks certification of service areas in the following two counties:

# Johnson County, MO

TOWNSHIP- NORTH	RANGE-WEST	<b>SECTIONS</b>		
47	24	12, 13, 24, 25		

# Pettis County, MO

TOWNSHIP- NORTH	RANGE-WEST	<b>SECTIONS</b>		
47	23	27, 28, 29, 30		

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# **APPENDIX C**

# THIS DOCUMENTS CONTAINS HIGHLY CONFIDENTIAL INFORMATION NOT AVAILABLE TO THE PUBLIC ORIGINAL FILED UNDER SEAL

KANSAS	CITY	POWER	& LIGHT	COMPANY
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#### **TERRITORIAL DESCRIPTION**

Pettis County

(Continued)

Pettis county and the south line of Sec. <u>30</u>, Twp. 47N, Range 23W; thence east along the south line of Sec. <u>30</u>, <u>29</u>, <u>28</u>, <u>27</u> Twp. 47N, Range 23W; and thence north along the east line of Sec. <u>23</u> and 24, Twp. 47N, Range 23W; and continuing east to the southeast corner of Sec. 19, Twp. 47N, Range 22W and thence north to the northeast corner of said Sec. <u>19</u>; thence east along the south line of Sec. 17 and 16 to the southeast corner of Sec. 16, Twp. 47N, Range 22W, and thence north along the east line of said Sec. <u>16</u> to the northeast corner of Said Sec. <u>16</u>; thence east along the south line of Sec. <u>10</u>, Twp. 47N, Range 22W, and thence north along the east line of Sec. <u>10</u> and <u>3</u>, Twp. 47N, Range 22W, to the northeast corner of Sec. <u>10</u>; thence north along the east line of Sec. <u>10</u> and <u>3</u>, Twp. 47N, Range 22W, to the northeast corner of said Sec. <u>35</u> and <u>36</u>, Twp. 48N, Range 22W, to the southeast corner of said Sec. <u>36</u>; thence north along the east line of Sec. <u>36</u>; thence north along the east line of Sec. <u>36</u>; thence north along the east line of Sec. <u>36</u>; thence north along the east line of Sec. <u>36</u>; thence north along the east line of Sec. <u>36</u>; thence north along the east line of Sec. <u>36</u>; thence north along the east line of Sec. <u>36</u>; thence north along the east line of Sec. <u>36</u>; thence north along the east line of Sec. <u>36</u>; thence north along the east line of Sec. <u>36</u>; thence north along the east line of Sec. <u>36</u>; thence north along the east line of Sec. <u>36</u>; thence north along the east line of Sec. <u>36</u>; thence north along the east line of Sec. <u>36</u>; thence north along the east line of Sec. <u>36</u>; 25 and <u>24</u> to the north line of Sec. <u>24</u> which is also the north line of Pettis County, Twp. 48N, Range 22W.

#### Saline County

The Company's territory in Saline County includes all of the county with the exception of a small area in the south-east corner separated by a boundary line described as follows:

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## **KANSAS CITY POWER & LIGHT COMPANY**



### **TERRITORIAL DESCRIPTION**

### Johnson County

<u>The Company's territory in Johnson County is a small area in the northeast corner of</u> Johnson County described as follows:

Beginning at the southwest corner of Sec. 25, Twp. 47N, Range 24W; and continuing north to the southwest corner of Sec. 1, Twp. 47N, Range 24W; thence east along the south line of Sec. 1, Twp. 47N, Range 24W to the southeast corner of Sec. 1; continuing south to the southeast corner of Sec. 25, Twp. 47N, Range 24W; thence west along the south line of Sec. 25, Twp. 47N, Range 24W to the point of beginning.

TOWNSHIP-NORTH	RANGE-WEST	SECTIONS	
47	24	12,13, 24, 25	

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