BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of a Working Case Regarding)Electric Vehicle Charging Facilities)Case No. EW-2016-0123

RESPONSE OF KANSAS CITY POWER & LIGHT COMPANY AND KCP&L GREATER MISSOURI OPERATIONS COMPANY TO STAFF REQUEST

Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO") (collectively, "KCP&L") hereby submit this response to the request made by the Missouri Public Service Commission Staff ("Staff") on May 27, 2016.

1. KCP&L understands that Staff seeks written legal and policy positions raised during the May 25th workshop to the extent those legal and policy positions differ from written submissions already made by a participant to this proceeding.

2. Consistent with its March 1, 2016, filing herein, KCP&L continues to assert that electric vehicle charging station service ("EVCS") provided by an investor-owned utility ("IOU") is subject to Commission authority and regulation. Similarly, KCP&L continues to assert that long-standing case law¹, as well as existing tariff provisions² which bar the re-sale of electricity in IOU service territory, also serve to prohibit entities other than the Commission-regulated IOU from providing and charging for EVCS service in that IOU's service territory.

3. However, as a result of studying the issue further and particularly rationales advanced by certain other interests, KCP&L has concluded that at the right time and under the right conditions, entities other than Commission-regulated IOUs should be permitted to provide and charge for EVCS service in the service territory of Commission-regulated IOUs.

¹ State ex rel. Danciger and Co. v. Public Service Commission of Missouri, 275 Mo. 483, 205 S.W. 36 (1918).

² Rule 5.03 on Sheet No. 1.19 of KCP&L's tariff, and Rule 3.02(B) on Sheet No. R-24 of GMO's tariff.

4. An IOU-owned EVCS network would ease an existing barrier to electric vehicle adoption that would likely not occur (and would certainly not occur as quickly) absent that network, thereby fostering development of a market for the benefit of the public and, under the right conditions in the future, EVCS service providers beyond IOUs.

5. Legislation would bring beneficial clarity to the provision of EVCS service by entities other than Commission-regulated IOUs, but legislation is not necessary for the deployment of IOU-owned EVCS.

WHEREFORE, KCP&L respectfully submits this response.

Respectfully submitted,

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

Dated: June 8, 2016

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been electronically mailed this 8th day of June, 2016 to all counsel of record in this proceeding.

[s] Robert J. Hack Robert J. Hack