

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

In the Matter of the Third Prudence Review of	)	
Costs Subject to the Commission-Approved Fuel	)	<b><u>Case No. EO-2011-0390</u></b>
Adjustment Clause of KCP&L Greater Missouri	)	
Operations Company.	)	

**ISSUES LIST, WITNESS LIST, ORDER OF WITNESSES,  
AND ORDER OF OPENING STATEMENTS**

COME NOW the KCP&L Greater Missouri Operations Company (“GMO”) on behalf of itself, and the Staff, and states as follows:

1. On April 23, 2012, the Commission issued its *Order Modifying Procedural Schedule* (“Order”) which, inter alia, ordered the parties to file an Issues List, Witnesses List, Order of Witnesses, Order of Cross-Examination, and Order of Opening Statements by May 11, 2012.

2. In response to the Commission’s Order, the parties jointly file the following issues. However, the parties do not necessarily agree that every issue listed is appropriate for Commission decision.

**I. Issues List**

1. Has Staff raised a serious doubt as to the prudence of GMO’s use of natural gas hedges to mitigate the price risk associated with spot purchased power?
2. Was GMO imprudent in its use of natural gas cross-hedges to mitigate the price risk associated with spot purchased power during the FAC audit period?
3. If so, must GMO refund to ratepayers some amount plus interest through GMO’s FAC mechanism? What is the amount that should be refunded, if any?

4. Did GMO properly account for its hedging costs under the Uniform System of Accounts, previous stipulations and orders of the Commission? If not, what is the appropriate remedy?
5. Do GMO's FAC tariffs authorize purchased power hedging costs for spot purchased power to be passed on to ratepayers through the FAC mechanism?
6. Does the Commission want GMO to stop hedging using natural gas futures contracts to mitigate the price risk associated with spot purchased power?
7. Should the Commission establish a policy which addresses the appropriateness of the use of derivative based hedges by electric utilities?

## **II. Order of Opening Statements**

1. GMO
2. Staff
3. Public Counsel
4. AGP/SIEUA
5. The Commercial Group
6. Federal Executive Agencies
7. Dogwood Energy LLC

### **III. Witness List And Order of Witnesses**

**Tuesday, June 5, 2012**

#### **A. GMO**

1. Dr. C.K. Woo
2. Wm. Edward Blunk
3. Scott H. Heidtbrink
4. Gary L. Clemens
5. Ryan A. Bresette
6. Tim M. Rush

**Wednesday, June 6, 2012**

#### **B. Staff**

1. Charles R. Hyneman
2. Lena M. Mantle
3. Dana E. Eaves

### **IV. ORDER OF CROSS-EXAMINATION**

The order of cross-examination, based generally on adversity, is the following:

#### **GMO witnesses**

Dogwood, Commercial Group, Federal Agencies, SIEUA/AGP, Public Counsel, Staff.

#### **Staff witnesses**

Dogwood, Commercial Group, Federal Agencies, SIEUA/AGP, Public Counsel, GMO.

**WHEREFORE**, GMO, on behalf of itself, and the Staff, and hereby submit their Issues List, Witness List, Order of Witnesses, Order Of Opening Statements And Order of Cross-Examination for consideration by the Commission.

Respectfully submitted,

/s/ James M. Fischer

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[Attorneys for KCP&L Greater Missouri Operations Company](#)

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 11<sup>th</sup> day of May, 2012.

/s/ James M. Fischer  
James M. Fischer