

JAMES M. FISCHER, P.C.

ATTORNEY AT LAW  
REGULATORY CONSULTANT

101 WEST McCARTY, SUITE 215  
JEFFERSON CITY, MO 65101

TELEPHONE (573) 636-6758  
FAX (573) 636-0383

December 14, 1999

FILED<sup>3</sup>

DEC 14 1999

Missouri Public  
Service Commission

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 3660  
Jefferson City, Missouri 65102

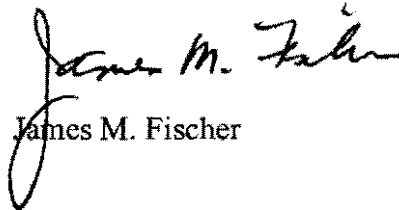
RE: *Kansas City Power & Light Company*  
Case No. EO-2000-210

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are an original and fourteen (14) copies of Kansas City Power & Light Company's Motion to Amend Kansas City Power & Light Company's Application for Approval of the Accrual and Funding of Wolf Creek Generating Station Decommissioning Costs at Current Levels. A copy of the foregoing Motion to Amend has been hand-delivered or mailed this date to parties of record.

Thank you for your attention to this matter.

Sincerely,



James M. Fischer

/jr  
Enclosures

cc: John B. Coffman, Office of the Public Counsel  
Lera L. Shemwell, Missouri PSC

THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

Missouri Public  
Service Commission

In the Matter of Application of )  
Kansas City Power & Light Company )  
for Approval of the Accrual and Funding )  
of Wolf Creek Generating Station )  
Decommissioning Costs at Current Levels )

Case No. EO-2000-210

**MOTION TO AMEND KANSAS CITY POWER & LIGHT  
COMPANY'S APPLICATION FOR APPROVAL OF THE ACCRUAL  
AND FUNDING OF WOLF CREEK GENERATING STATION  
DECOMMISSIONING COSTS AT CURRENT LEVELS**

COMES NOW Kansas City Power & Light Company ("KCPL"), and its Motion to Amend its Application for Approval of the Accrual and Funding of Wolf Creek Generating Station Decommissioning Costs at Current Levels ("Application"). In support thereof, KCPL states the following:

1. On September 1, 1999, and pursuant to 4 CSR 240-20.070(9), KCPL filed its Application, along with its Decommissioning Cost Study for the Wolf Creek Generating Station ("1999 Study").

2. The 1999 Study contains numerous projections and assumptions. The 1999 Study's original cost component for property taxes was based on the assumption that after final shutdown of Wolf Creek Generating Station ("Wolf Creek") in 2025, the only real property subject to continued property taxation would be the land and right of way at Wolf Creek.

3. After the Application was filed, TLG, Services, Inc., the company that prepared the 1999 Study, informed KCPL that this assumption is incorrect and inconsistent with the methodology for computing property taxes that was used in prior decommissioning cost studies, and provided KCPL with a revised schedule of the

"Decon" expenditures associated with the revised tax assumptions. A copy of the revised schedule of expenditures and its cover letter are attached hereto as Exhibits A and B, respectively.

4. The revised forecast assumes that some of the buildings at Wolf Creek will continue to be used during all or part of the nine year decommissioning project. Accordingly, it is likely that these buildings would be subject to property taxation for as long as they continue to be used. KCPL has recalculated estimated property taxes based on this corrected assumption and arrived at the revised property tax value.

5. The revisions to the 1999 Study are as follow:

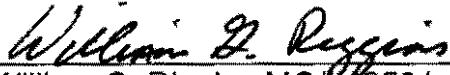
- a. Increase in the property tax cost component of the 1999 Study from \$608,537 (\$553,215 plus 10% contingency of \$55,322) to \$3,885,197 (\$3,531,997 plus 10% contingency).
- b. Increase in the overall decommissioning cost study estimate from \$467,190,245 to \$470,466,924. The increase, \$3,276,679, represents the incremental increase from the original property tax cost (plus contingency) to the revised property tax cost (plus contingency). Please note that the total incremental increase in the 1999 Study does not exactly equal the incremental increase between the two property tax values because of rounding in the 1999 Study.

6. The revised property tax assumption has resulted in an increase in the overall decommissioning cost estimate that is less than 1%.

WHEREFORE, KCPL respectfully requests permission to amend its Application and 1999 Study so that the above-mentioned revisions are incorporated.

Dated this 14<sup>th</sup> day of December, 1999.

Respectfully submitted,

  
\_\_\_\_\_  
William G. Riggins MO# 42501 *by GRT*  
Gerald A. Reynolds CT# 407871  
Kansas City Power & Light Company  
1201 Walnut Street  
Kansas City, MO 64106  
(816) 556-2138  
(816) 556-2787 (Facsimile)

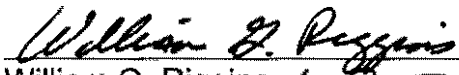
Attorneys for Kansas City Power & Light Company

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed via first class mail, postage prepaid, or hand-delivered to the following counsel of record this 14th day of December, 1999.

John B. Coffman  
Office of Public Counsel  
P. O. Box 7800  
Jefferson City, Missouri 65102

Lera L. Shemwell  
Missouri Public Service Commission  
301 West High Street, Room 530  
Jefferson City, Missouri 65102

  
\_\_\_\_\_  
William G. Riggins *WGR*

**TABLE 3.1**  
**SCHEDULE OF ANNUAL DECON EXPENDITURES**  
(1999 dollars)

Year	Period 1 Planning	Period 2 Decommissioning	Period 3 Site Restoration	Totals
2025	\$91,676,482			\$91,676,482
2026	\$29,569,435	\$23,976,229		\$53,545,664
2027		\$77,349,510		\$77,349,510
2028		\$76,382,335		\$76,382,335
2029		\$75,023,195		\$75,023,195
2030		\$75,157,910		\$75,157,910
2031		\$33,941,136		\$33,941,136
2032		\$689,178	\$19,974,976	\$20,664,154
2033			\$21,680,125	\$21,680,125
2034			\$5,096,413	\$5,096,413
	\$61,245,917	\$362,519,492	\$46,701,514	\$470,466,924



November 24, 1999  
W11-1336-9909

Mr. Warren Wood  
General Counsel  
Wolf Creek Nuclear Operating Corporation  
1550 Oxen Lane N.E.  
P.O. Box 411  
Burlington, Kansas 66839-0411

Reference: Wolf Creek Generating Station Decommissioning Cost Study; TLG  
Document W11-1336-002, Rev. 0, dated August 26, 1999

Dear Mr. Wood:

TLG has recalculated the decommissioning cost reported in the referenced document, for the DECON alternative only, to incorporate the updated information provided on site property taxes. As expected, the total estimated cost to decommission the Wolf Creek Generating Station increased from \$467,190,245 to \$470,466,924, an increment of approximately \$3.28 million. A revised schedule of expenditures is provided with this letter for the cost distribution associated with the new tax assumptions. Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,

A handwritten signature in cursive script that reads "William A. Cloutier, Jr.".

William A. Cloutier, Jr.  
Vice President, Decommissioning Projects  
TLG Services

cc: T. Jake Garrett