

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

In the Matter of the Application of Kansas City Power &                    )  
Light Company and KCP&L Greater Missouri Operations                    )  
Company for the Issuance of an Accounting Authority Order            )   File No. EU-2014-0077  
Relating to their Electrical Operations and for a Contingent            )  
Waiver of the Notice Requirement of 4 CSR 240-4.020(2).                )

**KANSAS CITY POWER & LIGHT COMPANY’S  
APPLICATION FOR CLARIFICATION**

COMES NOW Kansas City Power & Light Company (“KCP&L” or “Company”), pursuant to 4 CSR 240-2.160, and respectfully requests the Commission clarify its July 30, 2014 Report and Order. In support thereof, the Company states:

1.       The Company requests clarification regarding two sentences in the Commission’s Report and Order. While not entirely contradictory, clarification by the Commission of these two sentences would be helpful as the issue will likely arise in the Company’s upcoming rate case filing.

2.       In paragraph 13 of the Report and Order, the Commission states:

As part of a previous settlement agreement (“Settlement Agreement”) KCP&L agreed that, prior to June 1, 2015, it would not seek to utilize any mechanism authorized in Senate Bill 179, such as an FAC, that might allow KCP&L to implement riders, surcharges or changes in rates outside of a general rate case based upon a consideration of less than all relevant factors. The Settlement Agreement was approved by the Commission in a July 28, 2005 order. [footnotes omitted]

This sentence appears to paraphrase the first sentence of Section III.B.1.c. of the Stipulation and Agreement in the Company’s Regulatory Plan which was approved by the Commission on August 23, 2005 in Case No. EO-2005-0329. The first sentence of the paragraph actually reads:

KCPL agrees that, prior to June 1, 2015, it will not seek to utilize any mechanism authorized in current legislation known as “SB 179” or other change in state law that would allow riders or surcharges or changes in rates outside of a general rate case based upon a consideration of less than all relevant factors.

3. However, on page 11 of the Report and Order, the Commission states that “As part of a general rate case, KCP&L may seek an FAC to include transmission costs incurred in June of 2015.” KCP&L does not believe that this sentence was intended by the Commission to indicate when the Company may file a rate case requesting an FAC that includes transmission costs. Instead, the Company interprets this sentence to put a time limit on when the Company can “seek to utilize” meaning actually implement a FAC mechanism. The FAC tariffs that the Company intends to file in its upcoming rate case will not become effective until after June 1, 2015 in accordance with the Regulatory Plan stipulation. Other parties may have a different interpretation of the Regulatory Plan stipulation and the Commission may need to determine this issue in ER-2014-0370.

4. The Company requests that the Commission clarify in an order that the sentence on page 11 of the Report and Order does not limit, beyond the language provided in paragraph 13 of the Report and Order, which is provided in paragraph 2 of this Application, when KCP&L can file a rate case requesting an FAC that includes recovery of transmission costs.

Respectfully submitted,

/s/ Roger W. Steiner

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**ATTORNEYS FOR KANSAS CITY POWER &  
LIGHT COMPANY**

**Certificate of Service**

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, to the certified service list in this proceeding this 28<sup>th</sup> day of August, 2014.

**/s/ Roger W. Steiner**  
Roger W. Steiner